

ST HELENS BOROUGH LOCAL PLAN 2020-2035

COPIES OF REGULATION 20 REPRESENTATIONS (REGULATION 22 (1) (D)) DOCUMENT

REPRESENTATION ORDER

RO0401 - RO0500

SEPTEMBER 2020

RO0401



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

1 5 MAR 2019

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent) Title: MR	
	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 346 Garswood Ring	Address:
Gavswood	
1 Wigan	Postcode:
Postcode: WN4 CTY	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 11 March 2019
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred metho	od of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To w	hich pai	rt of the Loca	l Plan d	loes this re	epresent	ation relate?	
Policy	LP AD5 Site IHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		its (please nar relevant part/s					
						2020-2035 is: gal Compliance and t	he Tests of Soundness
Legally	/ Complia	ant?			Yes	☐ No	
Sound	?				☐ Yes	☑ No	
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Please	tick as a	ppropriate					
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
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already way beyond was capacity - eg. traffic has to queue to leave Garsmird at the Ashkon Cross. has to queue to leave Garsmird Please continue on a separate sheet if necessary
Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original epresentation at the publication stage.
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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)								
	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination					

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:							
				7			

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0402

EL0255



Fwd: St Helens Borough Local Plan 2020-2035: Submission Draft Anne-Marie Cunliffe

to:

planningpolicy 13/03/2019 16:50 Hide Details

From: Anne-Marie Cunliffe

To: planningpolicy@sthelens.gov.uk

Forwarded message

From: "Anne-Marie Cunliffe" Date: 13 Mar 2019 16:46

Subject: St Helens Borough Local Plan 2020-2035: Submission Draft

To: <planningpolicy@st.helens.gov.uk>

Cc:

Further to earlier comments on the warehousing being erected at Florida Farm North, having seen at first hand how enormous these units are in reality and how close to existing residences I am duty bound to express my dismay at the prospect of further development. Local residents aredealing daily with travel delay, noise and light pollution and the warehousing is not yet finished nor has the attendent heavy goods traffic begun to operate. There appears to be no concerted attempt to negate any of the considerable impact on the environment or welfare of those of us whose lives are being blighted by this development. Therefore, the prospect of further units in the area existing without proper infrastructure in place is horrifying to contemplate. We have a suggestion of 522 houses being sited at Vicarage Road in an area already congested with traffic, close to a flooding area, with inadequate health centres and school provision. How can any of this improve things? We should use the thousands of empty properties before building residences on greenbelt land. Are homeowners, who have paid a premium to reside in a greenbelt area, going to be financially compensated for the consequent reduction in house values and moved into a lower council tax band? May I respectfully remind councillors that they are elected to represent the wishes of the people and not their own agenda!

AM Cunliffe Lifelong Resident of the (badly) affected area D - LPAOK



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0 1 MAR 2019

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: M(SS	Title:
First Name: ANNE-MARIE	First name:
Last Name: CUNLVITE	Last Name:
Organisation/company: NA	Organisation/company:
Address: 339 LIVERPOOL ROAD	Address:
Postcode: <u>VAII</u> WN	Destander
Tel No:	l No:
Mobile No	obile No:
Email:c	mail:
Signature:	Date: 25 2 19
Please be aware that anonymous forms cannot be considered you MUST include your details above	be accepted and that in order for your comments to be
Would you like to be kept updated of future st	tages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred m	ethod of communication. If no email address is provided,

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3. To which	part of the Local Pla	an does this repre	sentation relate?	
Policy LPAOS SITE 2HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/secti	on)		
4. Do you c	onsider the St Helen ad the Guidance note	s Borough Local for explanations o	Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
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Sound?			Yes No	
Complies w	ith the Duty to Cooper	rate	Yes No	
Please tick	as appropriate			
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RO0403



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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25 FEB 2019

PART A - YOUR DETAILS

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)					
	Title:					
First Name: Par Na	First name:					
Last Name: C. NICO	Last Name:					
Organisation/company:	Organisation/company:					
Address: 6 Stining Drive	Address:					
Goswood,						
rishin-in-maioriela						
Postcode: Why oug	Postcode:					
Tel No:	Tel No:					
Mobile No:	Mobile No:					
Email:	Email:					
Signature:	Date: 19/02/19					
Please be aware that anonymous forms cannot considered you MUST include your details about	be accepted and that in order for your comments to be ve.					
Would you like to be kept updated of future s	stages of the St Helens Borough Local Plan 2020-2035? In publication of the Inspector's recommendations and					
Yes (via email)	☐ No					
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	Paragraph/	Policies	Sustainability	Habitats
Policy	diagram	Map	Appraisal/	Regulations
LPA06	table		Strategic Environmental	Assessment
- Ste			Assessment	
145				
	nts (please name relevant part/secti	on)		
			Plan 2020-2035 is: of Legal Compliance and the	ne Tests of Soundness
Legally Compl	iant?	U	Yes No	
Sound?			Yes PNo	
Complies with	the Duty to Cooper	rate	Yes No	
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Please continue on a separate sheet if necessary

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	ur representation is seeking a modifica oral part of the examination? (the heari	ation; do you consider it necessary to participate at ngs in public)
1	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:		

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	Last Name:
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	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 20-02-2019
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-PAOS Site IHA	diagram table	Мар	Appraisal/ Strategic Environmental Assessment	Regulations Assessment
	ments (please name and relevant part/section	on)		
	onsider the St Helen		Plan 2020-2035 is: f Legal Compliance and t	he Tests of Soundness
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FROM THE GREENBELT

Please continue on a separate sheet if necessary

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/

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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Yes (Via Email)

Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)	
Title: MRS	Title:	
First Name: MARGARET	First name:	
Last Name: CUNLIFFE	Last Name:	
Organisation/company:	Organisation/company:	
Address: 452 GARSWOOD RD	Address:	
Postcode: WN4 OXJ	Postcode:	
Tel No:	Tel No:	
Mobile No:	Mobile No:	
Email:	Email:	
Signature:	Date: 28-2-2019 of be accepted and that in order for your	
omments to be considered you MUST include	e your details above. Ire stages of the St Helens Borough Local	

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u> by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St. Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

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Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

		Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
	ent and	its (please nam relevant	ie		
			or explanations of L	I Plan 2020-2035 is: egal Compliance and the	Tests of Soundness
Legally	Complia	ant?	Yes 🕅	No C	
Sound?			Yes 🗆	No K	
Complic Cooper		the Duty to	Yes 🗆	No 🗷	
Please I Positive Justifie Effectiv	read the ely Prep d? re?	Guidance note t	for explanations of the	t because it is not: he Tests of Soundness	
or fails If you v	to comp	bly with the dut	to cooperate. Please to compliance or so	ocal Plan is not legally case be as precise as poundness of the Local P	ossible.
Not jus populat One of recyclir	tified-the tion of S the pur	e council shoul It Helens has d poses of the G derelict and oth	d be put to strict p eclined since 198 reen Belt is to assi ner land. Using Gr	roof of it's population es 1. Where are all the extriction ist in urban regeneration een Belt does not do this be Green Belt.Houses in	ra people coming from? In by encouraging the is. Release of Green Be

sustainable due to the lack of school places, Doctor's surgeries, bus routes, parking at the train

Station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road and Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

2.PA 05

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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ation; do you consider it necessary to participate at gs in public)
Yes, I wish to participate at the oral examination

If you wish to pa	rticipate at the oral part of	of the examination,	please outline w	thy you consider
this to be necessar	y:			

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0405



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

- 1 MAR 2018

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

0 1 MAR 2019

Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: DEREK	First name:
Last Name: CUNLIFFE	Last Name:
Organisation/company:	Organisation/company:
Address: 452 CARSWOOD RD	Address:
Postcode: WN4 OXJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 28-2-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

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ion of the Plan for examination, publication of the
adoption of the Plan)
No 🗌

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Telephone:

01744 676190

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Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

Policy PSD / diagram / table		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other documents (please document and relevant part/section)	name			
4. Do you consider the St Please read the Guidance n			Tests of Soundness	
Legally Compliant?	Yes 🗶	No C		
Sound?	Yes 🗆	NoX		
Complies with the Duty to Cooperate	Yes 🗆	No 🗷	No 🗷	
5. If you consider the Loca Please read the Guidance in Positively Prepared? Justified? Effective? Consistent with National F	ote for explanations of			
6. Please give details of wor fails to comply with the	thy you consider the duty to cooperate. Pl	ease be as precise as po	ossible.	
If you wish to support the box to set out your commo	ents			
population of St Helens had One of the purposes of the recycling of of derelict and will cause significant harm	as declined since 198 e Green Belt is to ass d other land. Using G n to the purposes of the	31. Where are all the extra sist in urban regeneration reen Belt does not do this he Green Belt.Houses in	a people coming from? by encouraging the s. Release of Green Be this area is not	

Station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. .Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

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CAROL.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification the oral part of the examination? (the hearings in	
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you conside to be necessary:	ler
and the second of the second o	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form. Please keep a copy for future reference.

RO0406



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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sation/company: s:de:
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Date: 25/2/19
and that in order for your comments to be
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No mmunication. If no email address is provide
ne

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall (open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: 01744 676190

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Now please complete PART B of this form, setting out your representation/comment.

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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

. To which	part of the Local Pla	in does this repre	sentation relate?	
Policy PA 1705 1806 1806	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	uments (please name and relevant part/secti	on)		
4. Do you o	consider the St Helen ead the Guidance note	s Borough Local e for explanations o	Legal Compliance and tr	
Legally Co	mpliant?		Yes No	DON'T KNOW
Sound?			Yes	
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Positively I Justified? Effective? Consisten	Prepared? t with National Policy?			
or fails If you w use this	to comply with the divish to support the legs box to set out your	uty to cooperate. I gal compliance or comments.	cal Plan is not legally corplease be as precise as prec	Plan, please also
dava	dopment i	in This pood ing to	obition on H jurther down pated by but	is scale is scale the Chapaley me devalops

relates to sound, having regard to the relates to soundness (NB please note that incapable of modification at examination) the Local Plan legally compliant or sound suggested revised wording of any policy of	1 9
"Dalete this lar removal broom the	o Greenbalt!
	Please continue on a separate sheet if necessary
After this stage, further submissions will be or and issues he/she identifies for examination. 8. If your representation is seeking a modification.	make further representations based on the original nly at the request of the Inspector, based on matters ation; do you consider it necessary to participate at
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of this to be necessary:	the examination, please outline why you consider

Thank you for taking the time to complete and return this response form.

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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD 0 1 MAR 2019

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1. Your Details	2. Your Agent's Details (if applicable)				
(we will correspond via your agent)	Title:				
	Title:First name:Last Name:Organisation/company:				
Organisation/company:					
HAYDOCK	Address:				
	Postcode:				
Tel No:	Tel No:				
Mobile No:	Mobile No:				
	Email:				
Signature	Date: 25/2/19				
Please be aware that anonymous forms can considered you MUST include your details a	not be accepted and that in order for your comments to be above.				
Would you like to be kept updated of futu (namely submission of the Plan for examinat adoption of the Plan)	re stages of the St Helens Borough Local Plan 2020-2035? tion, publication of the Inspector's recommendations and				
Yes (via email)	☐ No				
Please note - email is the Council's preferre we will contact you by your postal address.	ed method of communication. If no email address is provided,				

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PART B - YOUR REPRESENTATION

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3. To which	part of the Local Pla	n does this repr	esentatio	n relate?		
Policy PA -05 OITE 2HA	Paragraph/ diagram table	Policies Map	Ap Str En	stainability opraisal/ rategic vironmental sessment	Habitats Regulations Assessment	
	uments (please name and relevant part/section	on)				
4. Do you o Please re	consider the St Helens ead the Guidance note	s Borough Loca for explanations	I Plan 202 of Legal C	0-2035 is: ompliance and	the Tests of Soundnes	S
Legally Cor	mpliant?		Yes	□ No	Acut Know	7
Sound?	A Company		Yes	☐ No		
Complies v	with the Duty to Coopera	ate [] Yes	No		
Please tick	as appropriate		777			
Please re Positively P	onsider the Local Plan ead the Guidance note Prepared?					
Justified?		Z]			
Effective?						
Consistent	with National Policy?	-	1			
or fails t	give details of why you to comply with the dut ish to support the lega box to set out your co	y to cooperate. al compliance o	Please be	as precise as	possible.	nd
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Greenbalt"
Please continue on a separate sheet if necessary
ation and suggested modification, as there further representations based on the original the request of the Inspector, based on matters a; do you consider it necessary to participate at in public)
Yes, I wish to participate at the oral examination
examination, please outline why you consider
1

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0407



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD 0 1 MAR 2019 (For official use only)

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

1 view at http://www.legislation.gov.uk/ukpga/2004/5/contents

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: MARINA	First name:
Last Name: Cuny FFF	First name:
Organisation/company:	Organisation/company:
Address: 2 AUGRY CRES	Address:
	Postcøde:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	
Signature:	Date: 25 2 19
Please be aware that anonymous forms cannonsidered you MUST include your details al	not be accepted and that in order for your comments to be bove.
Would you like to be kept updated of futur (namely submission of the Plan for examinati adoption of the Plan)	re stages of the St Helens Borough Local Plan 2020-2035? ion, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred we will contact you by your postal address.	d method of communication. If no email address is provided,

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No.

"Delete this land from the proposed removal from the Greenbalt."

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

D 1 MAR 2019

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: MARINA	First name:
Last Name: CuniffE	Last Name:
Organisation/company:	Organisation/company:
	Address:
THIOSEYS	
Postcode WALL OXD	Postcode:
Tel No:	ć
Mobile	e No;
Email:	
Signature:	Date: 25/1/19
Please be aware that anonymous forms cannot be considered you MUST include your details above	be accepted and that in order for your comments to be
Would you like to be kent undated of future st	tages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred me we will contact you by your postal address.	ethod of communication. If no email address is provided,

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Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which	part of the Local Pla	an does this repre	sentation relate?	
Policy PA O 4 TES EA EA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	uments (please name and relevant part/secti	on)		
4. Do you o	consider the St Helen ead the Guidance note	s Borough Local e for explanations o	f Legal Compliance and th	ne Tests of Soundness
Legally Co	mpliant?	- 1	Yes No F	SONT KNOW
Sound?	O. Care (et)	Ē	Yes No	
	with the Duty to Coope	rate	Yes No	
	as appropriate			
Please re Positively F Justified? Effective?		e for explanations o	of the Tests of Soundness	
Consistent	t with National Policy?			
or fails	to comply with the di	uty to cooperate. gal compliance or	ocal Plan is not legally co Please be as precise as p soundness of the Local	ossible.
2/ High	h volumes already	of prediction	belt will can belt of green belt cated traffice pocity on the croady grandenbelt in resource.	h. will add to highways

	Local Plan legally co ggested revised wordi Delette emoval						
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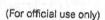
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RO0408

Ref: LPSD





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

view at http://www.legislation.gov.uk/ukpga/2004/5/contents

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MeS	Title:
Last Name: CUNNWGUM	Last Name:
e.ga.noddon/company.	
Address: O CELVIO COSE	Address:
Ne Wism	Address.
Postcode: WN4 OUQ	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 11-3-19
ease be aware that anonymous forms canno ensidered you MUST include your details abo	t be accepted and that is and a fac-
ould you like to be kept updated of future	stages of the St Helens Borough Local Plan 2020-2035? In publication of the Inspector's recommendations and
Yes (via email)	□ No
	method of communication. If no email address is provided

RETURN DE INILO

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Policy	LPAOS Sute IHA.	Paragraph/ diagram table		Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		ts (please nar elevant part/s				
					Plan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
Legally	/ Complia	int?		V	Yes 🔲 No	
Sound	?	10			Yes \(\sqrt{No}	
Compl	ies with th	ne Duty to Coo	operate		Yes No	
Please	tick as a	ppropriate				
Justifie Effectiv	ve?	red? National Polic	y?			
or fa	ils to cor u wish to	nply with the	duty to	cooperate. Pompliance or s	cal Plan is not legally cor ease be as precise as po coundness of the Local P	ssible.
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7	. Please set out what modification(s) you consider necessary to make the Local Plan legally
	compliant or sound, having regard to the matter you have identified at 6. above where this
	relates to soundness (NB please note that any non-compliance with the duty to cooperate is
	incapable of modification at examination). You will need to say why this modification will make
	the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your
	suggested revised wording of any policy or text. Please be as precise as possible.

Dekte this land from the proposed removal from the Green Beit.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

 $\sqrt{}$

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

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- Greenbelt land should only be released in exceptional circumstances.
 There are no exceptional circumstances in St Helens, which is a borough with a falling population.
 The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
- Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.The Local Plan will undo all the good work to date.
- The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
- Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
- There would be a detrimental effect to local wildlife.
 Protected species are known to be nesting in the proposed site.
- 6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.

 These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.

 Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
- 7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
- 8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HA
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. Drainage in the area is very poor site 1HA regularly floods in wet weather. If this site is developed where will the water go through the existing estates?

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

Policy PACE Site 145	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	nts (please name relevant part/section	on)		
	sider the St Helen the Guidance note		Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally Compli	ant?	\checkmark	Yes 🗌 No	
Sound?			Yes 🗹 No	
Complies with	the Duty to Cooper	rate	Yes No	
Please tick as	appropriate			
Positively Preparations Justified? Effective?			the Tests of Soundness	
or fails to co	omply with the dut	ty to cooperate. Plaid to compliance or s	cal Plan is not legally cor ease be as precise as po coundness of the Local P	ssible.
See ?	separate	sheet o	ittached	
+				

1	7. Please set out what modification(s) you consider necessary to make the Local Plan legally
	compliant or sound, having regard to the matter you have identified at 6. above where this
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	the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your
	suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Green Belt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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 The Local Plan will undo all the good work to date.
- The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
- Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
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 Protected species are known to be nesting in the proposed site.
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 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

2

RO0409

O-LPAO6 2-Statement of Common Ground

Representor Details

Web Reference Number	WF0274
Type of Submission	Web submission
Full Name	Mr John Cunningham
Organisation	
Address	19 Sherwood Close Rainhill Prescot Merseyside L35 4RA
Agent Details	carriedo y al calabra (CI)

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

LPA06
3HS
Yes
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4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The road network surrounding 3HS is already at capacity now and would be made unsustainable by the proposed housing development. There is only one A road serving the Rainhill area (Warrington Road), together with a B road (Rainhill Road) and a C road (Two Butt Lane). These roads at times are are currently unable to support present traffic demands, particularly during rush hours, and developing further houses in the vicinity will only add to the problem for all residents who own vehicles and make it more dangerous for pedestrians and cyclists. Because of existing traffic jams around the junction of Rainhill Road and Warrington Road (skew bridge), traffic already uses residential estates around Longton Lane as a cut through and this will only be exacerbated. The junction at skew bridge would require significant widening and improvement to support this housing development. Furthermore, housing development would be unsustainable in this locality due to a lack of infrastructure and services such as doctors surgeries, dental practices, schools, hospitals and A&E facilities. These services are already under strain without the proposed housing development. In addition, the water table of 3HS is already a confirmed zone 2 and 3 flood zone and further housing development on this land would put houses bordering the brook risk of flooding. Furthermore, the land at and around 3HS supports a variety of wildlife and plants, including 13 protected species. Development at this site would be detrimental to these species, as

well as having a negative effect on people's wellbeing by removing some of the only green belt land—in this locality. Housing development would lead to increased risk of air pollution and would result in increased risk of premature death from respiratory diseases, which are already higher in St Helens compared to regional and national averages (e.g. between 2013 and 2015 there was an average of 51.9 deaths per thousand in St Helens, compared to 33.1 deaths per thousand in England as a whole). Finally, there has been no statement of common ground with neighbouring authorities such as Knowsley Borough Council, where new housing developments are already under way, negating the need for further housing development on 3HS.

7. Please set out modification(s) you consider are necessary

The Council should not consider removing 3HS from classification as green belt land, therefore abiding with the National Planning Policy Framework (2019).

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 9:52:26 AM
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RO0410

O-LADY	2-LPAOS	(3)-GEN
4-10P	3-Para 172	DTC

Representor Details

Web Reference Number	WF0283
Type of Submission	Web submission
Full Name	Mr Zach Cunningham
Organisation	The second section of the second seco
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No	
Is sound?	No	
Complies with the duty to cooperate?	No	*

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

7. Please set out modification(s) you consider are necessary

I do not believe this version satisfies:

the requirement for Sustainable development

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.
 In addition, the following fundamental elements of the Plan remain questionable

Economic growth predictions for St Helens are based on flawed historical



	pirational targets included in the plan.	
	order collaboration has not been undertaken.	7(
 The Housing Need assessment 	does not use Standard Methodology, and no	
case for exceptional circumstance		
 The latest estimate produced be 	by the ONS (2016) predicts that 383 houses	
per year will be required to mee	t housing need in St Helens. The Council	
are using an older forecast (2014	4) of 486.	
 The Plan makes no mention of 	Brownfield and Previously Developed Land	
(PDL) that is not (yet) available o	r included on the Brownfield Register.	
 The St Helens Council statement 	nt of "Contaminated Land (CL) sites" (2015)	
indicates that 3,170 ha of the lov	vest priority contaminated land exists in	10
St Helens. Two Green Belt sites of	of 56.6 ha and 148 ha are being	(2)
	sites and included to fulfil the housing	_
need, much less than 7% of the 3	3,170-ha available, if it were to be	
remediated.	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	Liverpool City Boolean Countries of Australia	
// CPCA) and naighbouring such as	Liverpool City Region Combined Authority	
(LCRCA) and neighbouring author		- 1
unsuitable sites outside the Bro	wnfield Register back into use. It is not	
	annot be made available within the 15-	
year plan period or the 25-year sa	afeguarded period being considered	
 The loss of Grade 1 and 2 Agriculation 	ultural land that comprises most Allocated	
	tioned. The negative impact on farming	(3)
and distribution jobs is not consid	dered.	(3)
 The Borough has significant long 	g term and intractable problems at Windle	
Island, Bleak Hill Road, Skew Bridge	ge in Rainhill, M6/J23 and M6/J21-26.	
The Infrastructure Delivery Plan (IDP) refers to current road	
	ne how local and borough wide road	(4)
improvements are to be made an	d funded. The Plan promotes unsustainable	
traffic growth causing severe traff	fic issues that will not satisfy the NPPF	
(2016)	The issues that will not satisfy the NFFF	1 44
	in the Plan will have a significant impact	(3)
	nd general health. It does not promote	0
less vehicle dependency with its	ind general health. It does not promote	
The IDD fails to supplie the income	proposals for edge of town developments.	
• The IDP falls to explain the impa	ict on Healthcare and Education. The	-
current situation is touched on br	oadly, but how this will be managed and	4
funded is missing or vague. There	is no indication or reference to	
8. If your representation is seeking	g a modification, do you consider it necessary to p	articipate at
the oral part of the examination?		
No, I do not wish to participate at	the oral examination	
9. If you wish to participate in the	oral part of the examination, please outline why y	ou consider
this to be necessary:		
Response Date	3/9/2019 6:18:12 PM	

RO0411

O-LPAOL 2-LPAOS 3-GEN 9-10P 5-Paga 17.2 DTC

Representor Details

Web Reference Number	WF0284
Type of Submission	Web submission
Full Name	Mr Evan Cunningham
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy LPA 06
Table 4.8
10, 13 & 14
Sustainability Appraisal 2019
Page 88

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

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7	Diagen cot	out modif	ication(e) ve	ou consider are	nococcani
	Please set	our moon	icationisi vi	ou consider are	necessarv

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- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.



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			2
Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no			

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RO0412

O-LPAO4	2-LPAOS	3)-GEN
9-10P	3-Para 17.2	_

Representor Details	ep	reser	tor	Detai	ls
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Web Reference Number	WF0286	
Type of Submission	Web submission	
Full Name	Ms Clare Cunningham	
Organisation		
Address	2 Lynton Way Windle St Helens WA10 6DZ	
Agent Details	THE RESERVE TO THE PERSON OF T	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy LPA 06	
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

7. Please set out modification(s) you consider are necessary	sary
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I do not believe this version satisfies:

the requirement for Sustainable development

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality. In addition, the following fundamental elements of the Plan remain questionable

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.





Adequate regional and cross border collaboration has not been undertaken.		(5)
	does not use Standard Methodology, and no ———	~
case for exceptional circumstance		
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	t housing need in St Helens. The Council	
are using an older forecast (2014		
	Brownfield and Previously Developed Land	
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remediated.		
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(LCRCA) and neighbouring author		
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	cannot be made available within the 15-	
year plan period or the 25-year s	afeguarded period being considered. —————	
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and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.		(3)
		(3)
	g term and intractable problems at Windle	
	ge in Rainhill, M6/J23 and M6/J21-26.	
The Infrastructure Delivery Plan (
improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable		1(4)
	fic issues that will not satisfy the NPPF	
(2016)		(3)
 The increase in traffic proposed in the Plan will have a significant impact 		(3)
	and general health. It does not promote	
less vehicle dependency with its p	proposals for edge of town developments.	
	act on Healthcare and Education. The	
current situation is touched on broadly, but how this will be managed and		(4)
funded is missing or vague. There		10
collaboration with the Hospital Tr	ust, local CCGs or education authorities	
B. If your representation is sooking	ng a modification, do you consider it necessary to p	auticimata at
the oral part of the examination?	o	articipate at
No, I do not wish to participate at		
9. If you wish to participate in the	e oral part of the examination, please outline why y	ou consider
this to be necessary:		
Response Date	3/9/2019 6:03:36 PM	

Representor Details

Web Reference Number	WF0111
Type of Submission	Web submission
Full Name	Mr Philip Curran
Organisation	
Address	Ivy House
	Higher Lane
	Rainford
	St Helens WA118NU
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	HA8 Rookery Lane
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

There are no exceptional circumstances that justify not using the standard method to calculate housing need for this development. The economic analysis is flawed and based on over-optimistic assumptions. There is no need to change green belt boundaries to try to justify the need for this development. The site is located next to an industrial development with industrial activity ongoing. Other sites have been excluded when industrial activity is so close to homes from a risk perspective. This land is grade 1 Agricultural Land that is actively farmed to produce food for our communities and provide employment to people in the community, taking this away is needless and counter productive.

7. Please set out modification(s) you consider are necessary

Do not build on Green Belt there are sufficient opportunities to build on brownfield sites throughout the borough.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 9:01:00 AM



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13th May 2019</u>. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

PART A - YOUR DETAILS

Ρ

1 3 MAY 2019

1. Your Details	Your Agent's Details (if applicable)(we will correspond via your agent)		
Title:	Title:		
First Name: KAREN	First name:		
ast Name: CURRY	Last Name:		
Organisation/company:	Organisation/company:		
Address: 14 CROCUS GARDENS NEW BOLD	Address:		
Postcode: WA9 4EE	Postcode:		
Tel No:	Tel No:		
Mobile	Nobile No:		
Email:	Email:		
Signature:	Date: 16 · 4 · 19		

Would you like to be kept updated of Plan 2020-2035? (namely submission Inspector's recommendations and ado	of future stages of the St Helens Borough Local of the Plan for examination, publication of the option of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's pladdress is provided, we will contact yo	referred method of communication. If no e-mail ou by your postal address.



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
0	Title:
First Name: John	First name:
Last Name: CUSHIOA	Last Name:
Organisation/company:	Organisation/company:
	Address:
JARSW000	
· · · · · · · · · · · · · · · · · · ·	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 11 \3\19
Please be aware that anonymous forms canno considered you MUST include your details ab	ot be accepted and that in order for your comments to be pove.
· · · · · · · · · · · · · · · · · · ·	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
Yes (via email)	☐ No
	I method of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which	part of the Loca	Il Plan does this	representat	ion relate?		
Policy	Paragraph/ diagram table	HA2 Policies Map HS 02 GAKNOO		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment	
	nents (please na nd relevant part/s	1				
4. Do you co	onsider the St Had the Guidance	elens Borough I	Local Plan 2	020-2035 is: I Compliance and t	he Tests of Soundne	ess
Legally Com	pliant?		 ☐ Yes	No No		
Sound?			Yes	☑ No		
Complies wi	th the Duty to Co	operate	Yes	✓ No		
Please tick a	as appropriate					
Positively Pro Justified? Effective? Consistent v	epared? vith National Poli	cy?				
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Please keep a copy for future reference.

1800756M





St. Helens Borough Local Plan 2020-2035/Local Plan Submission Draft (HA8) Emma Cutler

to:

planningpolicy 13/03/2019 16:44



I write to give my comments in the above plan with regards to building new houses in Rainford Village.

The main points are as follows:-

- * There are no exceptional circumstances to justify not using the standard method to calculate housing need.
- * The economic analysis is based on over-optimistic assumptions and is therefore flawed.
- * The level of land needed is not as high as set out in the Local Plan.
- * No exceptional circumstances to change Greenbelt boundaries.
- * Other reasonable alternatives have not been fully explored, eg using more previously developed land. These will have less impact on the environment and lead to less need for new infrastructure.
- * The Council have failed to co-operate with other Councils and have not published any statement(s) of common ground.

Rainford Specic Points for HA8 (8HA) Rookery Lame:-

- * Only 4 sites score 4 negatives (red) on the Sustainability Appraisal and the other 3 have all been discarded. So St. Helens Borough Council's own assessment is that HA8 (8HA) is the least appropriate Greenbelt site for housing in Phase 1.
- * This site is right next to an industrial estate and subject to risks associated with industrial activity, such as pollution and explosives (both of which have been recorded recently). Other sites have been excluded during assessments due to be next to similar industrial employment land, eg SHLAA 3016 site assessment ref 16m & 142.
- * The site is Grade 1 Agricultural Land and is actively farmed. This provides employment in the agricultural sector which are threatened by the removal of this site for the Greenbelt.

Me and my family accept the need for housing development in Rainford and are in principal are not opposed to it. However, we are deeply concerned firstly regarding the amount of new homes that are proposed to be built and also building on Greenbelt land rather than utilising previously developed/Brownfield sites.

We hope St. Helens Council reconsiders this Plan for all the reasons stated above.

Emma Cutler 4 Croxteth Drive Rainford St. Helens WA11 8JZ



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 7 MAR 2019

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent) Title:の人	Title:
	First name:
Last Name: CUTLER	Last Name:
Organisation/company:	Organisation/company:
Address: 47 SPRINGFIELD PARK	Address:
HAYDOCK ST HELENS	
	/
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 6/3/19.
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future sta (namely submission of the Plan for examination, p adoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred met we will contact you by your postal address.	hod of communication. If no email address is provided,

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which pa	art of the Local Pla	an does this repre	sentation relate?	
Policy LPA 05 Ste 2-HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ents (please name d relevant part/secti	on)		
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	the Duty to Cooper		Yes No	
Please tick as	appropriate			
Positively Prep	The state of the s	for explanations o	f the Tests of Soundness	
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Effective?				
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	Please continue on a separate sheet if necessary
and issues he/she identifies for examination	ification; do you consider it necessary to participate at
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part this to be necessary:	t of the examination, please outline why you consider

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.





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Ref: LPSD

0 7 MAR 2019

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This form has two parts;

V---- D-4-11-

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
	Last Name:
	Organisation/company:
ITAY DOCK ST. HELENS	Address:
	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email	Email:
Signature:	Date: 6 (3 19
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? dication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred methowe will contact you by your postal address.	od of communication. If no email address is provided,

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

Policy		Paragraph/	Policies	Sustainability	Habitats		
11.	05 2HA	diagram table	Мар	Appraisal/ Strategic Environmental	Regulations Assessment		
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				Plan 2020-2035 is: If Legal Compliance and to	ne Tests of Soundness		
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Sound?				☐ Yes ☐ No			
Compli	es with t	he Duty to Coope	rate	Yes No			
Please	tick as a	ppropriate					
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7	. Please set out what modification(s) you consider necessary to make the Local Plan legally
	compliant or sound, having regard to the matter you have identified at 6. above where this
	relates to soundness (NB please note that any non-compliance with the duty to cooperate is
	incapable of modification at examination). You will need to say why this modification will make
	the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your
	suggested revised wording of any policy or text. Please be as precise as possible.

"Delete this land from the proposed removal from the Greenbelt."

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Representor Details

Web Reference Number	WF0444
Type of Submission	Web submission
Full Name	Ms Charmian Cvek
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

3. To which part of the Local Flan does this representation relate.		
Policy	LPA05	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents	Green Belt Review 2018	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the prediction for new housing need is flawed and would seem to be based on old predictions. The town of St Helens is in poor shape economically. There is no mention of Brownfield or Previously Developed Land. It seems only the easiest option (for the developers) has been considered. It is not effective because building on areas around the town centre would surely help in terms of regenerating the town itself, rather than opting for annexing the green belt. The use of green belt will create pseudo suburban enclaves with little or no affinity with the town of St Helens and no incentive to shop or socialise there. I am one of the few of my friends who actually ever goes into St Helens town centre. Most people prefer to visit Wigan or Warrington - by car of course - so the plan is not consistent with national policy (ie NPPF 2018). It will result in increased strain on already over-used roads. The recent works at Windle Island have created rat runs with HGVs using the country lanes. The air quality has deteriorated considerably in recent years. I can smell the pollution from the road when I am in my garden and avoid even going for a walk along Burrows Lane at the busiest times because it is so bad. The litter along the country lanes is deplorable. There is no alternative to car use, public transport in the Eccleston area is dire with no link to Prescot any more and the bus from St Helens Junction terminating in town at a very early

hour. There is no viable alternative to driving in this area. More traffic will put an intolerable strain on the roads - especially as there is so much development towards Haydock. This number of houses will also put a strain on local services - schools and medical practices.

7. Please set out modification(s) you consider are necessary

Greenbelt which is so vitally needed should be safeguarded against development. I was appalled by the use of the word safeguarding in the context of this plan, i.e. meaning safeguarding for future development and that is what prompted me to voice my concerns about the local plan. Brownfield and PDL should be considered, including bringing sites presently considered unsuitable back into use, instead of targeting prime agricultural land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

r		
	Response Date	2/24/2019 6:12:26 PM





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

1 1 MAR 2019

(For official use only)

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This form has two parts:

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable) ALSO UN BEHALF OF
	Title: MCS
11. 11. 11. 11. 11. 11. 11. 11. 11. 11.	First name: JoAA
	Last Name: DAGNALL
	Organisation/company:
Address: 100, BEECH GARDENS	Address: 14, OLD LANE,
	RAINFORD
	ST. HELENS
	Postcode: WAII 8JE
Signature:	Date: 8/3/19
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	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
✓ Yes (via email)	□ No
Please note - email is the Council's preferred	

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

WA10 1HP

St.Helens Council

Town Hall Victoria Square St Helens

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To w	hich par	t of the Loca	al Plan d	loes this re	epresenta	tion relate?	
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						2020-2035 is: al Compliance and th	ne Tests of Soundness
Legally	y Complia	ant?			☐ Yes	☐ No	
Sound	?				Yes	No	
Compl	ies with t	he Duty to Co	operate		☐ Yes	☐ No	
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nd iss	ues he/she identifies for examination.	ly at the request of the Inspector, based on matters ation; do you consider it necessary to participate at ngs in public)
	And the second control of the second control	
	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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	of future stages of the St Helens Borough Local Plan 2020-20 amination, publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's prive will contact you by your postal add	referred method of communication. If no email address is providences.

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St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

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Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

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HA LPA S	Paragraph/ diagram table Smoch	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	nents (please name nd relevant part/sect	ion)		
4. Do you co Please rea	ensider the St Helen d the Guidance note	ns Borough Local e for explanations o	Plan 2020-2035 is: of Legal Compliance and the	ne Tests of Soundness
Legally Com	pliant?		Yes No	
Sound?			Yes No	
Complies wit	th the Duty to Coope	rate	Yes No	
Please tick a	s appropriate			
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	Please continue on a separate sheet if necessary ccinctly all the information, evidence and supporting
epresentation at the publication stage. Ifter this stage, further submissions will be on not issues he/she identifies for examination.	nake further representations based on the original ally at the request of the Inspector, based on matters ation; do you consider it necessary to participate at
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of this to be necessary:	the examination, please outline why you consider
	appropriate procedure to adopt to hear those who have

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Monday 13th May 2019 Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	_ Title:
First Name: JANGT	First name:
Last Name: DALTON	Last Name:
Organisation/company:	Organisation/company:
Address: 9 FIRTHLAND WAY, PARR	Address:
	Postcode:
Tel No:	Tel No:
	Mobile No:
Email:	Email:
Signature:	Date: 18 -4 -2019
ease be aware that anonymous forms cannot be aconsidered you MUST include your details above.	cepted and that in order for your comments to be
	s of the St Helens Borough Local Plan 2020-2035? ication of the Inspector's recommendations and
Yes (via email)	□ No
ease note - email is the Council's preferred methode will contact you by your postal address.	d of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Monday 13th May 2019

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

by:

RO0423



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD 3 0 APR 2019

(For official use only)

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Please note that you must complete Parts A and B of this form.

Last Name: Organisation/company: WAY Address: Postcode: el No: Mobile No:
First name: Last Name: Organisation/company: WAY Address: Postcode: el No: Mobile No:
Last Name: Organisation/company: WAY Address: Postcode: el No: Mobile No:
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mail:
Date: 18/4/2014.
Date: 18/4/20

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St.Helens Council

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St Helens WA10 1HP

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RO0424

1-LPAOS	2) LPA06, 3HS	3 LPA06, 8HS
Q-10001	B-10P	

Representor Details

Web Reference Number	WF0073
Type of Submission	Web submission
Full Name	mrs Maureen Daly
Organisation	
Address	48 Springfield Lane
	Eccleston
	St,Helens wa10 5ha
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 - LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

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The population of St. Helens has been falling over the last 30 years. The figures in the census show that the population of the town has fallen from 190,800 in 1981 to 175,300 in 2011. That is a drop of 15,500, or 8% in the 30 years. This shows that, the economic growth predictions for St Helens are based on flawed historical data. So, the plans ambitious targets cannot be justified.

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The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable.

Taking all these issues with the plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. Therefore, it must surely regarded as unsound.

- 7. Please set out modification(s) you consider are necessary
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date 3/13/2019 1:19:02 PM

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RO0425

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Representor Details

Web Reference Number	WF0112
Type of Submission	Web submission
Full Name	Mr Mark Daly
Organisation	Mr
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No	
Is sound?	No	
Complies with the duty to cooperate?	No	

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No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 8:53:31 AM	

RO0426

Representor Details

Web Reference Number	WF0131
Type of Submission	Web submission
Full Name	Mrs Marcelle Daly
Organisation	Mr
Address	
Agent Details	

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Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 & LPA06	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic Environmental Assessment		
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Other documents		

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No	
Is sound?	No	
Complies with the duty to cooperate?	No	

5. If you consider the Local Plan is unsound, it because it is not:

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When in fact what "Safeguarded for Development" means that the land is removed from the projection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years

Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected.

By failing to use the most up to date information the plan is seriously flawed from the beginning. Ignoring the use of brownfields site, to benefit developers. Compounds this error. The brownfield sites have the capacity to for fill the needs of the plan and could do so well within the 15-year term of the plan.

The impact of the traffic that 1,069 houses for 8HS and 956 houses 3HS has not been addressed. It would be fair to assume an average of 2 cars be house, so that would be that would be an additional 4050 cars, using already congested narrow roads. This would clearly have an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". Which would be grounds for refusal, as stated in The National Planning Policy Framework. The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable.

The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to apricate the current value that land has, in terms of crop production, employment and biodiversity. Taking all these issues with the plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. Therefore, it must surely regarded as unsound.

- 7. Please set out modification(s) you consider are necessary
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date 3/12/2019 9:19:18 PM



RO0427

Representor Details

Web Reference Number	WF0133
Type of Submission	Web submission
Full Name	Mr Gerry Daly
Organisation	Mr
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 and LPA06
Paragraph / diagram / table	El rios dia El Ado
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	1
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No	
Is sound?	No	
Complies with the duty to cooperate?	No	

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you co	nsider the Local Plan is not legally compliant or is unsound or
ialls to comply with the duty to coo	perate. Please be as concise as possible.
Dear Sir	01 02 -
I wish to object to the current St Hel	ens Local Plan, (LPA05 and LPA06) The plan fails on several key
issues.	the plan rais on several key

- Fails to use accurate figures for housing targets.
- Fails to consider the use of "Brownfield" sites.
- Fails to provide a sustainable transport plan.
- Fails the requirement for sustainable development.
- Fails to consider food security.
- Fails to be transparent.

Fails to use accurate figures for housing targets

The population of St. Helens has been falling over the last 30 years. The figures in the census show that the population of the town has fallen from 190,800 in 1981 to 175,300 in 2011. That is a drop of 15,500, or 8% in the 30 years.

The housing need assessment used in the plan does not follow the Standard Methodology and no exceptional circumstances case has been made to justify not using the Standard Methodology.

The economic growth predictions for St Helens are based on flawed historical data. So, the plans ambitious targets cannot be justified.

The plan uses out of date figures from 2014 to estimate the number of houses required to be 486 per year. The latest figures from the Office of National Statistics in 2016 estimate the number of houses required to be 383 per year. So, the plan over estimates the housing requirement by 103 houses per year, which is a 20% over estimation. Furthermore, even using the inflated figures in the plan, that would equate to 1724 houses requiring 57 hectors of land. Yet table 4.5 in the plan states that 288 hectors of land will be required.

The borough also has 2,815 houses that have been vacant for over six months. The plan does not make any provision for bringing these houses back into use.

Fails to consider the use of "Brownfield" sites

The plan fails to consider the Brownfield and Previously Developed Land that is not available or included in the Brownfield register. The Council, along with the Liverpool City region and other neighbouring Councils of no policy for bringing Brownfield or previously Used land that is not on the Brownfield Register on to the register. This is an unacceptable oversight. It is more than reasonable to assume that this land could be made available for use with the timescale on the plan The Councils statement of Contaminated Land, in 2015, was 3,170 hectors, of the lowest priority contaminated land. The area of Greenbelt land to be reclassified for development in the plan is n 204.6 hectors. This is 6% of the land could be reclaimed for housing. The Contaminated land will have to be cleaned at some point so there is no justification not to include this in the plan. The Council claim that they need to safeguard land for development, that will consider planning 2 or 3 local plans. The removal of greenbelt land cannot be justified, while there such an amount contaminated land that can be reclaimed for use, during the same time period required for 2 or 3 local plans. There can be no justification to destroy the prime agricultural land whilst there are such huge stocks of brownfield land that can be cleaned and made useful again.

It is both morally right make use to reuse brownfield sites, as the land will have to be made useful again at some point. And it makes long term economic sense, as the brown field sites have the benefit of the existing infrastructure. The council should adopt a policy of Brownfield land first. The plan seems to suggest that the use of greenfield sites is required, so that developers would have lower costs and therefore could deliver "affordable housing". This view would not provide an "exceptional circumstance" that could be used to justify the removal of this land from the protection provided by greenbelt status. The plans aim should be to benefit the people of St Helens not delevopers.

Fails to provide a sustainable transport plan

There is already a significant traffic issues, especially around Windle Island. The current work being carried out at Windle Island, is aimed and improving the flow of traffic between Liverpool and Manchester and has no bearing on the plan. The Infrastructure Delivery plan refers to the current work at Windle Island, but it does not set out any local or borough wide road improvements would be made or paid for. The plan would promote a wholly unsustainable growth in traffic. As it can be expected that most of the houses would have two cars. This amount of traffic growth does not satisfy the National Planning Policy Framework (2018).

The National Planning Policy Framework, states that "Development should only be prevented or refused on highway grounds if these would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe".

Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe".

From Windle the route into the town centre, along Rainford Road and Dentons Green. Are already heavily congested as is also the route from traffic coming into town from Rainford and any other traffic coming into town from the East Lanc's Road. The route into town from Eccleston uses Millfield's and Knowsley Road. This route has already two developments at Eccleston Grange, which will deliver 626 houses and a new development, on the site of the former garage, further down on Knowsley Road. The effects of these developments have not been considered.

Fails the requirement for sustainable development

The plan proposes to build houses in an area that is already becoming over congested and has a very poor infrastructure. Building more houses would only magnify this problem. The Infrastructure Development Plan does not explain the impact of the additional housing on Healthcare or Education. The plan references the current situation but does not provide any explanation on future management or funding. There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities.

Eccleston only has one doctors surgery and that is in the process of moving closer to town, along with the only Pharmacy, so they will be difficult to access unless you have access to a car. The Schools in Eccleston and Windle are already over subscribed and are situated in residential streets. There are already issues with safety at the start and end of the school day. So, adding even more traffic into this mix will increase the risk of accidents and the consequences that will bring. The bus routes that serve Eccleston have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an hour. The bus service stops at 6pm residents have to rely on cars.

The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars.

The increase in traffic proposed in the plan will inevitably lead to a reduction to air quality an increase in noise pollution, with the harmful effects on health and wellbeing issues will cause. Fails to consider food security

The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever. Fails to be transparent

I have been shocked by the cynical way in which the council has marked huge area's of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development.

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By failing to use the most up to date information the plan is seriously flawed from the very start. This error is further compounded by disregarding the use of Brownfield sites. That have the capacity to for fill the needs of the plan and could do so well within the 15-year term of the plan. The impact of the traffic that 1,069 houses for 8HS and 956 houses 3HS has not been addressed. It would be fair to assume an average of 2 cars be house, so that would be that would be an additional 4050 cars, using already congested narrow roads. This would clearly have an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". Which would be grounds for refusal, as stated in The National Planning Policy Framework.

The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable.

The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to apricate the current value that land has, in terms of crop production, employment and biodiversity.



Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected.

Taking all these failures in the current plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. As a consequence, it must surely regarded as unsound.

- 7. Please set out modification(s) you consider are necessary
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Barransa Data	3/12/2019 9:14:52 PM
Response Date	•

RO0428



Ref: LPSD 01 MAR 2019

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent) Title: Mrs	2. Your Agent's Details (if applicable) Title:
First Name: Sarah	First name:
Last Name: Daniel	Last Name:
Organisation/company:	Organisation/company://
Asniva Goss, Asnion-in-	Address:
Postcode: WN4 04V	Postcode:
Signature:	Date: 25 th Feb 2019
ease be aware that anonymous forms cannot be acconsidered you MUST include your details above.	cepted and that in order for your comments to be
ould you like to be kept updated of future stages amely submission of the Plan for examination, public doption of the Plan)	of the St Helens Borough Local Plan 2020-2035? cation of the Inspector's recommendations and
Yes (via email)	□ No
ease note - email is the Council's preferred method	of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council Town Hall

Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall (open Monday-Friday 8.30am - 5.15pm)

planningpolicy@sthelens.gov.uk

or by email to:

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Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which	n part of the Local Pla	in does this repres	sentation relate?		
	Paragraph/ diagram table EA, 5 FA, 6FA	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment	
	iments (please name and relevant part/section	on)			
4. Do you o	consider the St Helense ad the Guidance note	s Borough Local P for explanations of	Plan 2020-2035 is: Legal Compliance and	I the Tests of Soundnes	s
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Sound?	110000000		res No		
Complies w	vith the Duty to Cooper	ate \(\square\)	res □ Mo		
Please tick	as appropriate				
Effective? Consistent	with National Policy?				
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relates to soundness (NB please note that incapable of modification at examination).	nsider necessary to make the Local Plan legally natter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your rext. Please be as precise as possible.
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8. If your representation is seeking a modification the oral part of the examination? (the hearing No, I do not wish to participate at the oral examination) 9. If you wish to participate at the oral part of	Ation; do you consider it necessary to participate at ings in public) Yes, I wish to participate at the ora examination
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan			Uabitata
Policy Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	n)		
4. Do you consider the St Helens Please read the Guidance note f	Borough Local I or explanations of	Plan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
Legally Compliant?		Yes No c	don't know
Sound?		Yes No	m M RAKE
Complies with the Duty to Coopera	te 🔲	Yes No	
Please tick as appropriate			
Please read the Guidance note for Positively Prepared?		- The resident destinations	
Justified?			
Effective?			
Consistent with National Policy?		L.	
6. Please give details of why you or fails to comply with the duty If you wish to support the legal use this box to set out your co	to cooperate. P	lease be as precise as po	ossible.
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suggested revised wording of any policy o	It will be helpful if you are able to put forward your or text. Please be as precise as possible.
rmation necessary to support/justify the repres	Please continue on a separate sheet if necess. ccinctly all the information, evidence and supporting sentation and suggested modification, as there
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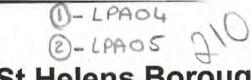
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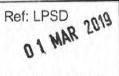
Please keep a copy for future reference.

RO0429





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	
Title: M/2 ·	Title:
First Name: PAUL	First name:
Last Name: DANIEL	Last Name:
Or sation/company:	Organisation/company:
HSHTON CROSS	P Address:
	Postcode:
	rel No:
	Mobile No:
	Email:
Signature:	Date: 25/2/19.
considered you MUST include your details above.	e accepted and that in order for your comments to be
Would you like to be kept updated of future sta (namely submission of the Plan for examination, padoption of the Plan)	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred me we will contact you by your postal address.	ethod of communication. If no email address is provided,

RETURN DETAILS

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post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

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3. To which pa	irt of the Local Pla	an does this repre	sentation relate?	v
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Please read to Positively Preparation Properties Preparation Prepa	- Albande	for explanations of	the Tests of Soundness	
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Other documents (please name document and relevant part/section) 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness Legally Compliant? Yes No No No No No No No N
Please read the Guidance note for explanations of Legal Compliance and the lests of Soundriess
Legally Compliant? Yes No Down KNON
LEGATIV COMPITATION
Sound? Yes Yo
Complies with the Duty to Cooperate Yes
Please tick as appropriate
Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy?

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Please keep a copy for future reference.



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

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PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

address is provided, we will contact you by your postal address.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Namo:	First name:
Last Name: Davbyshie	Last Name:
Organisation/company:	Organisation/company:
Address: 160 Gartons lave-	Address:
Postcode:	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 22 - 3 - 19
lease be aware that anonymous forms cannot omments to be considered you MUST include you Would you like to be kept updated of future Plan 2020-2035? (namely submission of the F	your details above. e stages of the St Helens Borough Local Plan for examination, publication of the
Inspector's recommendations and adoption of Yes (Via Email)	the Plan) No





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
Last Name: DARN 3 Rou 6(1	Last Name:
	Organisation/company:
	Address:
121 GAN	
and the second s	Postcode:
	Tel No:
	Mobile No:
Email:	Email:
	1
Signature	Date: 11/3/2-19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stag (namely submission of the Plan for examination, pu adoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred meth we will contact you by your postal address.	nod of communication. If no email address is provided,

RETURN DETAILS

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post to: Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: 01744 676190

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which	part of the Local Pla	an does this repre	sentation relate?					
Policy LPAOL SIVO IHS	diagram table Map Appraisal/ Strategic Assessment Environmental							
	ments (please name and relevant part/secti	on)						
	onsider the St Helen ad the Guidance note		Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness				
Legally Con	mpliant?		Yes 🔲 No					
Sound?			Yes 🗹 No					
Complies w	rith the Duty to Cooper	rate 🔲 '	Yes 🗹 No					
Please tick	as appropriate							
Please re Positively Pr Justified? Effective?	repared?		the Tests of Soundness					
6. Please gi	comply with the du	ty to cooperate. P	cal Plan is <u>not legally co</u> lease be as precise as po	ossible.				
use this l	box to set out your c	omments.	oundness of the Local F					
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1 2 MAR 2019 St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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	Title:
	First name:
	Last Name:
Organisation/company:	Organisation/company:
	Address:
ASHTON-IN-MAKERFIELD LOIGHU	
	Postcode:
	Tel No:
	Mobile No:
Email:	Email:
Signature:	Date: (1/3/2c/q
Please be aware that anonymous forms cannot be considered you MUST include your details above.	e accepted and that in order for your comments to be
	ages of the St Helens Borough Local Plan 2020-2035? Sublication of the Inspector's recommendations and
Yes (via email)	☐ No
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Policy PAOB Site IHS	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name nd relevant part/secti	on)		
	onsider the St Helen ad the Guidance note		Plan 2020-2035 is: Legal Compliance and the	ne Tests of Soundness
Legally Com	npliant?	V	Yes No	
Sound?	J		Yes 🔽 No	
Complies wi	ith the Duty to Cooper	rate \Box	Yes 🗹 No	
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Effective?				
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7. Please set out what modification(s) you consider necessary to make the Local compliant or sound, having regard to the matter you have identified at 6. above relates to soundness (NB please note that any non-compliance with the duty incapable of modification at examination). You will need to say why this modified the Local Plan legally compliant or sound. It will be helpful if you are able to proceed to suggested revised wording of any policy or text. Please be as precise as possible.	ve where this to cooperate is ification will make put forward your
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Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

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LPAO6 - SITE IHS
PFOREI

D 4 MAR 2219 (For official use only)

Ref: LPSD

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: ms	Title:
First Name: Janet	First name:
Last Name: DAVENPORT	Last Name:
Organisation/company:	Organisation/company:
NORTH ASHTON	Address:
	Postcode:
, 00,000	Tel No:
	Mobile No:
	Email:
·	
Signature:	Date: 30(2)19
Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.	ccepted and that in order for your comments to be
namely submission of the Plan for examination, publ	s of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and
adoption of the Plan)	

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Policy	LPAO6 Site IHS	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		ts (please name elevant part/section	on)		
				Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally	y Complia	int?	4	Yes No	
Sound	desirable room		<u> </u>	Yes ☑ No	
Compl	ies with th	ne Duty to Cooper	ate .	Yes No	
Please	tick as a	ppropriate	1/4 all		
Justifie Effectiv	ve?				
Consis	stent with	National Policy?			
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Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

LPAOS - Site IHA

PF0262

Ref: LPSD

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Title: MS	Title:
	First name:
Last Name: DAVENPORT	Last Name:
Organisation/company:	Organisation/company:
NORTH ASHTON	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 20102/19
onsidered you MUST include your details above.	es of the St Helens Borough Local Plan 2020-2035
namely submission of the Plan for examination, put doption of the Plan)	olication of the Inspector's recommendations and
Yes (via email)	□ No
lease note - email is the Council's preferred metho	od of communication. If no email address is provide

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Policy	LP AO 5 SITE IHA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		its (please name relevant part/secti	on)		
4. Do y	ou cons	ider the St Helen	s Borough Local	Plan 2020-2035 is: of Legal Compliance and	the Tests of Soundness
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3 MAY 2019

PART A - YOUR DETAILS

Pla

. Your Details	2. Your Agent's Details (if applicable)
	(we will correspond via your agent)
itle: MQ	Title:
irst Name: ROBERT	First name:
ast Name: DAYENA	DET Last Name:
organisation/company:	Organisation/company:
oddress: 36 THE 1	PRISTURES Address:
rostcode: WA94ZB	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 02/05/19 .
mments to be considered you	us forms cannot be accepted and that in order for your MUST include your details above. pdated of future stages of the St Helens Borough Local
Plan 2020-2035? (namely sui	bmission of the Plan for examination, publication of the
nspector's recommendations	and adoption of the resty
nspector's recommendations Yes 🗓 (Via Email)	No 🗌



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13th May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

13MAY 2019

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
	Title:
Title: MRS	
First Name: VICTORIA	First name:
Last Name: DYNENPORT	Last Name:
Organisation/company:	Organisation/company:
Address: 36 THE PASTURES	Address:
ST HELENS	
Postcode: WAG 423	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 02/05/19.
lease be aware that anonymous forms car omments to be considered you MUST incl	nnot be accepted and that in order for your ude your details above.
Would you like to be kept updated of fu Plan 2020-2035? (namely submission of Inspector's recommendations and adopted	the Plan for examination, publication of the
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's prefe address is provided, we will contact you b	erred method of communication. If no e-mail by your postal address.
address is provided, we will contact you b	y your posiar address.

Representor Details

Web Reference Number	WF0065
Type of Submission	Web submission
Full Name	Mr Paul Davenport
Organisation	
Address	23 Begonia Gardens
	Bold
	St Helens WA9 4FT
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Yes, LPA02, 03 & 05		
Paragraph / diagram / table			
Policies Map	Yes		
Sustainability Appraisal / Strategic			
Environmental Assessment			
Habitats Regulation Assessment			
Other documents			

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Such a huge increase in available homes will only have a negative impact all near all aspects of local infrastructure and even quality of living.

There are already multiple housing developments in very local areas and there is a real risk of saturating the housing market in this area, reducing prices of homes therefore negatively impacting the wider economy of the town, overall reputation and living conditions socially.

Local roads cannot handle such an increase in traffic volume that would be caused and the allowed development should be greatly reduced from the current plans.

7. Please set out modification(s) you consider are necessary

The development should reduce the number of homes it proposes to build and only be completed if and when local infrastructure can cope with the increased local population.

Large single developments should be implemented in stages to prevent sudden and harse burdens on the area as a whole and then assess the actual need/demand for more homes at each stage of development to avoid saturation of the housing market and collapse of local house prices. St Helens is at risk of becoming a socially challenged area already without this increased pressure from an abundance of available homes

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 2:07:25 PM



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PART A - YOUR DETAILS

1 3 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable)
	(we will correspond via your agent)
Title: MQS	Title:
First Name:	First name:
LAURIE	I and Manage
Last Name: DAVERIN	Last Name:
Organisation/company:	Organisation/company:
Address: 16 IBERIS	GDNS Address:
NEW BOLD, ST.	HELENS
Postcode: WA9 UFY	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 29/04/19.
lease be aware that anonymous for ments to be considered you MU	orms cannot be accepted and that in order for your JST include your details above.
Plan 2020-2035? (namely submis Inspector's recommendations and	
	No
Yes 🔟 (Via Email)	



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1. Your Details	2. Your Agent's Details (if applicable)
	(we will correspond via your agent)
Title: ML	Title:
First Name: MASIC	First name:
Last Name: DAVERIN	Last Name:
Organisation/company:	Organisation/company:
Address: 16 IBERIS GARDENS NEW BOWL ST HELENS Postcode: WA9 4FY	Address:
Postcode: WA9 4FY	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Pate: 29 4/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated Plan 2020-2035? (namely submission inspector's recommendations and accommendations and accommendations)	of future stages of the St Helens Borough Local n of the Plan for examination, publication of the option of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's address is provided, we will contact	oreferred method of communication. If no e-mail ou by your postal address.



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (I.e. Comment) Form

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1. Your Details	2. Your Agent's Details (if applicable)
	(we will correspond via your agent)
Title: MISS	Title:
First Name: JC55ICA	First name:
Last Name: DAVERIN	Last Name:
Organisation/company:	Organisation/company:
Address: 16 IBERIS GARDENS New BOLD, 5+ Helens	Address:
Postcode:WAQ 4FY	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email	Email:
Signature:	Date: 29/04/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of Plan 2020-2035? (namely submission	of the Plan for examination, p	ens Borough Local ublication of the
Inspector's recommendations and adop	otion of the Plan)	
Yes (Via Email)	No 🗹	
Please note - e-mail is the Council's pre address is provided, we will contact you		ation. If no e-mail





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PF0920



Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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1. Your Details

Part B - Your Representation(s)

1 3 MAY 2019

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title: BOLD+CLOCK FACE ACTION GROWF
First Name: SUSAN	First name:
Last Name: DAVEY	Last Name:
Organisation/company: Bab+cox Face	Section Organisation Organisati
Address: 12 FRENCHFIELD CRES	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 11/3/19
Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stages (namely submission of the Plan for examination, publicadoption of the Plan)	s of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and
X Yes (via email)	☐ No
Please note - email is the Council's preferred method we will contact you by your postal address.	d of communication. If no email address is provided,

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall (open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

	hich pa				eprese	entation relate?	
Policy	~	Paragraph / diagram / table		Policies Map	~	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Oraft Gre PCPA 20	eenbel 004 se	t Review 2016 – Appetition 20(5)(a) c, d, e	endix 4
4. Do yo	ou con	sider the St Hele	ens Bo	rough L	ocal Pi	an 2020-2035 is:	
Please r	ead the	Guidance note for	or expla	anations (of Lega	f Compliance and the 1	ests of Soundness
Legally	Compl	iant?	Yes			No ☑	
		THE REAL PROPERTY AND ADDRESS OF	THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, OF THE OWNER, OF THE OWNER, OW	THE RESERVE AND ADDRESS OF THE PARTY OF THE	The state of the s		
Sound?			Yes			No ☑	
Sound? Complie	es with	the Duty to	Yes			No □	
Sound?	es with		_				
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Sound? Complie Coopera Please tic 5. If you Please n	es with ate ck as ap considered the ely Prep 1?	propriate der the Local Plate Guidance note for	Yes	rsound.	is it be at the 7	No □	

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not legally compliant because the local development scheme (LDS) for St Helens refers to the adherence to the Statement of Community Involvement 2013. Paragraph 3.12 states that it should "be well targeted and reach out to the seldom heard groups", which it didn't do. We live adjacent to the land to be developed and were not informed by the local council via letter. One notice had been posted on a lamppost on Gorsey Lane, which residents rarely walk past, after the consulting period on the revised plans had finished, nothing else. For the same reasons, this also contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, for the requirements about giving notice and publicity, inspection by the public of the local development document and the nature and extent of consultation with the public.

The NPPF paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There





should be sufficient access to services, yet schools and doctors to name just two local services are full.

It is not justified and is unsound because the proposals are not consistent with National Policy. The proposals contravene NPPF (2019) Section 13 which states in paragraph 134 that Green Belt should be protected against unrestricted urban sprawl and encroachment into the countryside. Furthermore insufficient justification is given for the exceptional need to release Green Belt for housing. Releasing the land from Green Belt operates at odds to the NPPF, it does promote the urban regeneration through recycling of derelict and other urban land.

The NPPF (2019) Paragraph 137 states:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development..."

- (1) St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).
- (2) On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.
- (3) There is no substantive evidence to suggest that there is a need to remove such a large site as 4HA from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised. The regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.

The NPPF (2019) paragraph 177 states:

"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."

Yet.

- (1) The Sustainability Assessment (SA) site assessment for 4HA scores "Likely to generate negative effects" for
 - a. SA1. To protect and enhance biodiversity and
 - b. SA2. To protect and improve land quality in St Helens
- (2) The Priority species of Grassland Assemblage Farmland Birds, are present at level 3 for the whole of HA4 (MAGIC database, March 2019), in particular Local BAP species Lapwing and Skylark. Brown Hare is also presumed to be present. These species cannot be translocated nor loss of their habitat mitigated against. Their presence is a material consideration.
- (3) Removing HA4 from the Green Belt, let alone allowing housing allocation, will make the protection of these habitats and species much harder.

Additionally, it is unsound because there is no commonality of methodology from one year to the next to review Green Belt, it has fundamentally and substantially changed the results. The draft Green Belt Review 2016 assessed the parcel of land off Gorsey Lane against Green Belt purposes in terms of its Green Belt function as medium but then reduced them in 2018 with no change to the surrounding areas of land use. The parcels of land had also been divided up differently with insufficient explanation in the supporting documentation as to why this had changed or how Purpose 1, 2 and 3 had been assessed differently. Essentially no explanation provided why this lands purpose had dropped to make it favourable for removal from Green Belt. Additionally the arguments put forward to protect land to the south of Gorsey Lane can be equally applied to land to the north.

Please continue on a separate sheet if necessary











7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land

To significantly reduce the amount of housing allocation in Bold and Clock Face, and distribute it evenly throughout St Helens so not to radically change the make up of the rural nature and local community.

To open up the consultation process on the revised plans as the best effort made to engage with the community to develop a sustainable plan that meets the needs of the local community.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

No, I do not wish to participate at the oral examination

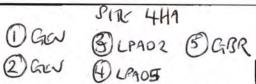
Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form. Please keep a copy for future reference.

RO0441



Ref: LPSD



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PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: IMR	Title: BOLD + CLOCK FACE ACTION
	First name: GROUP
	Last Name:
Organisation/company: 305+ CLOCK	Organisation/company:
하루 100 - 100 이번 시에 100 이번에 이번에 이렇게 되었다면서 하는데	
Address: 12 FRENCHAELD CRES	Address:
ST HAENS	
Postcode: WA94FZ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	
Local Section 1	
Signature	Date: 11/3/19
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	accepted and that in order for your comments to be
Yould you like to be kept updated of future stag namely submission of the Plan for examination, puridoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	□ No

Please note - email is the Council's preferred method of communication. If no email address is provided,

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Local Plan St. Helens Council Town Hall Victoria Square St Helens **WA10 1HP**

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall (open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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Please use a separate copy of Part B for each separate comment/representation.

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3. To w	/	Paragraph / diagram / table	Policies Map ✓		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)			Draft Gre PCPA 20	eenbe	It Review 2016 – Appetection 20(5)(a) c, d, e	endix 4

4. Do you consider the Seffe Please reed the Guerrages with		The second secon
Legally Compliant?	Yes C	No ☑
Sound?	Yes C	No ☑
Complies with the Duty to Cooperate	Yes 🗹	No 🗆

Please tick as appropriate

Harrist Comment of the Comment of th	
Positively Prepared?	
Justified?	I
Effective?	С
Consistent with National Policy?	\square

6. Please grot or fails to count If you wish to box to set out

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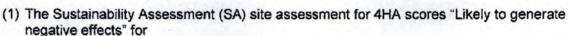
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Yet.



- a. SA1. To protect and enhance biodiversity and
- b. SA2. To protect and improve land quality in St Helens
- (2) The Priority species of Grassland Assemblage Farmland Birds, are present at level 3 for the whole of HA4 (MAGIC database, March 2019), in particular Local BAP species Lapwing and Skylark. Brown Hare is also presumed to be present. These species cannot be translocated nor loss of their habitat mitigated against. Their presence is a material consideration.
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Please continue on a separate sheet if necessary





7. Please so put that meditation() you consider to cover it can be be Local Plan legally compliant or some transfer to the constant of the Local Plan legally relates to the constant of the Local Plan legally incapable of months.

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land for development.

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To open up the consultation process on the revised plans as the best effort made to engage with the community to develop a sustainable plan that meets the needs of the local community.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the largester, based.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

BRIAN+ SUSAN DAVEY

12 Frenchfields Crescent

Bold

St Helens

Merseyside

WA9 4FZ



Dear Sir / Madam,

As an extremely concerned resident of Bold, I write in response to the recently published St Helens Borough Local Plan 2020 – 2035. From the outset I strongly oppose this plan.

My rational is due to several significant factors,

- Savid Javid Secretary of State for Home and Communities and Local Government has stated in Parliament that 'Greenbelt is absolutely sacrosanct' This was echoed in the conservative manifesto.
- Greenbelts primary purpose is to prevent urban sprawl, but in doing this it provides
 countryside to the people. It has a huge environmental value. In the face of climate change it
 has an increasingly important role in storing carbon and preventing flooding and is a vital
 economic resource for food security and soil protection.
- Britain has lost half of its wildlife a 56% decline of farmland birds between 1970 and 2015.
 Since 2016 the number of critically endangered species in the UK has reached 165. The UK now considered one of the most nature depleted countries in the world. These fields are home to may of these species, and development of these fields will decimate their habitat.
- It should be noted that for every new house built on greenbelt land it is estimated that between four and seven additional car trips would be generated per week.
- In St Helens 936 houses have been classed as long-term empty. St Helens Council Tax figures from October 2018 show that there were 2853 unused homes in the borough.

In view of the above, the following areas,

LPSD 4HA 2988 Houses and LPSD 5HA 569 Houses, must be removed from the Local Borough Plan.



26 FEB 2019

RO0442





St Helens Borough Local Plan of MAR 2019 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	Title
Title: MR	
First Name: JOHU	First name:
_ast Name:DAYIES	Last Name:
Organisation/company:	Organisation/company:
Address: 25 WHITEHOUSE CLOSE	Address:
HAYDOCK	/
ST. HELENS	
Postcode: WAII OJW	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25 - 2 - 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which	part of the Local Pla	an does this repre	sentation relate?	- Fizz = 311 = Fiz
Policy P 405 Site 2HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	uments (please name and relevant part/sect	on)		
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Please tick	as appropriate			
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Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary	v to participate at
the oral part of the examination? (the hearings in public)	, to handshall at

1

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



St Helens Borough Local Plan 2020-2035 (Submission Draft) (For official us Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2L

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

1. Your Details

First Name: JOHN

Title: MR

Part A - Personal Details

Part B - Your Representation(s)

First name:

2. Your Agent's Details (if applicable)

PART A - YOUR DETAILS

(we will correspond via your agent)

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

Last Name: DAVIES	Last Name:
Organisation/company:	Organisation/company:
Address: 25 WHITEHOUSE CLOSE	Address:
HAYDOCK	
ST. HELENS	
Postcode: WAII OJW	Postcode:
	Tel No:
	Mobile No:
	Email:
	Date: 25 - 2 - 19 accepted and that in order for your comments to be
considered you MUST include your details above.	
Would you like to be kept updated of future sta	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
adoption of the Plan) Yes (via email)	□ No

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Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

4. Do you cons Please read t Legally Complia Sound? Complies with t	ant? the Duty to Coopera	s Borough Local for explanations o	Ap Str. Env As:	ompliance and th	Habitats Regulations Assessment The Tests of Soundness The Tests of Soundness The Tests of Soundness
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Please keep a copy for future reference.

RO0443

St.Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)

2020-2035 (Submission Draft)

Representation (i.e. Comment) Form

(For official use only)

Ref: LPSD

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1 3 MAR 2019

PART A - YOUR DETAILS

we will contact you by your postal address.

1 view at http://www.legislation.gov.uk/ukpga/2004/5/contents

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Muss	Title:
First Name: JOANNE	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 17 LANGTIAM R	Address:
Postcode: UN4 OSG	Postcode:
_Tel No:	Tel No:
	Mobile No:
	Email:
Signature:	Date: 23/2/19
Please be aware that anonymous forms cannot local considered you MUST include your details above	be accepted and that in order for your comments to be e.
• • •	stages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred m	nethod of communication. If no email address is provided,

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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?										
Policy LPAOL SITE WHA	Paragraph/ diagram table	Polic Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment					
Other documents (please name document and relevant part/section)										
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compliant or sound, having regard to the ma relates to soundness (NB please note that a incapable of modification at examination). Y	sider necessary to make the Local Plan legally atter you have identified at 6. above where this ny non-compliance with the duty to cooperate is ou will need to say why this modification will make will be helpful if you are able to put forward your text. Please be as precise as possible.
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Please note the Inspector will determine the set a indicated that they wish to participate at the color.	appropriate procedure to adopt to hear those who have of the examination
Thank you for taking the time to complete ### Please keep a copy for future reference.	turn this response form.



1 3 MAR 2019 St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: M·SS First Name: JoANJE	Title:First name:
Last Name: DAVIES	Last Name:
Organisation/company:	Organisation/company:
Address: 17 LANGHOLM ROAD GARSWOOD	Address:
Λ) I CC	Postcode:
Tel No:	Tel No:
Mobile N	Mobile No:
Email:	Email:
Signature:-	Date: 6(3(19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pradoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	☐ No

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA05 SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									
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Please keep a copy for future reference.

1800756M

1 3 MAR 2019



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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1 view at http://www.legislation.gov.uk/ukpga/2004/5/contents

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: , manuf	First name:
Last Name: DAVIES	Last Name:
Organisation/company:	Organisation/company:
Address: 17 LANGHOLM ROAD GABSWOOD	Address:
Postcode: WN4 o5G	Postcode:
Tel No:	Tel No:
Mobile No: 1	Mobile No:
Email:	Email:
Signatur	Date: 6/3/19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred met we will contact you by your postal address.	hod of communication. If no email address is provided,

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. . .

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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: 01744 676190

NEXT STEPS

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Now please complete PART B of this form, setting out your representation/comment.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To w	vhich pa	rt of the Local	l Plan c	loes this	represent	ation relate?	
Policy	LPAO4 SITE LEA SEA GEA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		nts (please nam relevant part/s					
		ider the St He he Guidance r					e Tests of Soundness
Legally	/ Complia	ant?			Yes	☐ No	
Sound	?				☐ Yes	No	
Compl	ies with t	he Duty to Coo	perate		☐ Yes	No	
Please	tick as a	ppropriate			·		
		der the Local F he Guidance n				ause it is not: Tests of Soundness	
Positive	ely Prepa	red?		-			
Justifie	d?						
Effectiv	ve?						
Consis	tent with	National Policy	/?				
_						lan is not legally con	npliant or is unsound
If you	u wish to	-	legal c	ompliance		dness of the Local P	
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HA	RM	TO THE	PUR	Poses	OF T	itt GREENBELT	г.
THE	= Cou	NCIL HAS	AL	READY	GRAN	TEO PERMISSION	, IN THE
							DA FARM NORTH.
416	H VOL	umes of	PRE	DICTED	TRAF	FIC WILL AD	D TO THE
Er	KISTIN	of over	CAF	ACITY	on T	H€ HIGHWAYS IN	THE VICINITY.

compliant or sound, having regard to the mare relates to soundness (NB please note that incapable of modification at examination).	onsider necessary to make the Local Plan legally matter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your or text. Please be as precise as possible.
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REMODAL FROM THE	GREEN BELT.
	Please continue on a separate sheet if necessary
nformation necessary to support/justify the repre- will not normally be a subsequent opportunity to representation at the publication stage.	esentation and suggested modification, as there make further representations based on the original at the request of the Inspector, based on matters
8. If your representation is seeking a modification the oral part of the examination? (the hearing)	ation; do you consider it necessary to participate at rings in public)
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of this to be necessary:	f the examination, please outline why you consider
Please note the Inspector will determine the mos ndicated that they wish to participate at the oral property for taking the time to complete and	

Please keep a copy for future reference.





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

we will contact you by your postal address.

¹ view at http://www.legislation.gov.uk/ukpga/2004/5/contents

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
T	Title:
First Name: TOANNE	First name:
Last Name: DAVIES	Last Name:
	Organisation/company:
Address: 17 LANGHOLM 2D	Address:
GARSWOOD	
	Postcode:
Tel No:	Tel No:
Mobile	Mobile No:
Email:	Email:
Signature: .	Date: 23/2/19
Please be aware that anonymous forms cannot b considered you MUST include your details above	e accepted and that in order for your comments to be
· · · · · · · · · · · · · · · · · · ·	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred me	ethod of communication. If no email address is provided,

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy SITE IHS	LPAOL	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										
•				-		2020-2035 is: al Compliance an	d the Te	sts of Soundne	ess	
Legally	Complia	ınt?			Yes	☐ No				
Sound?	?				☐ Yes	19 No				
Compli	es with tl	ne Duty to Co	operate		☐ Yes	No				
Please	tick as a	ppropriate								
-		ier the Local ne Guidance i				use it is not: Tests of Soundne	ss		;	
Positive	ely Prepa	red?								
Justifie	d?									
Effectiv	/e?				☑					
Consis	tent with	National Polic	y?							
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lf you	u wish to		legal c	ompliance		dness of the Loc	-			
It is not justified. The cauncil should be put to strict proof in its estimates. St Helens population has been in decline since 1981. Where are the extra people										
-	Coming from? What of recycling derelict & other urban land? using green belt discourages this. trasing in this area isn't sustainable because of the lack of school places, Doctors surgeries and services. The highways are ill swited to such a development.									
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compliant or sound, having regard to the m relates to soundness (NB please note that a incapable of modification at examination).	nsider necessary to make the Local Plan legally latter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make it will be helpful if you are able to put forward your text. Please be as precise as possible.
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	Please continue on a separate sheet if necessary
epresentation at the publication stage. After this stage, further submissions will be on and issues he/she identifies for examination.	ly at the request of the Inspector, based on matters
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of this to be necessary:	the examination, please outline why you consider
Please note the Inspector will determine the most ndicated that they wish to participate at the oral participate and remaining the time to complete and the time time to complete and the time time to complete and the time time time time time time time tim	

Please keep a copy for future reference.





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

2 4 APR 2019

(For official use only)

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Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MS	Title:
First Name:	First name:
Last Name: pAvit.	Last Name:
Organisation/company:	Organisation/company:
Address: C/O 17 LANGHOLM RO.	Address:
Postcode:	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 3 · 0 (· 19 ·

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

, ,	of future stages of the St Helens Borough Local of the Plan for examination, publication of the
Inspector's recommendations and ado	ption of the Plan)
Yes (Via Email)	No 🗌

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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St. Helens Council

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Victoria Square

St. Helens Merseyside WA10 1HP

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Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To whi	ch part of the Local	Plan	does this r	eprese	ntation relate?	and ordered by the managed the
Policy	Paragraph		Policies		Sustainability	Habitats
	/ diagram		Мар		Appraisal/	Regulation
-PAOS	/ table		•	AHI	Strategic	Assessment
					Environmental	
					Assessment	1
	cuments (please na	me				
documen	it and relevant					
part/secti	on)					
4. Do you	consider the St He	elens E	Borough Lo	ocal Pla	n 2020-2035 is:	
Please rea	ad the Guidance note	for exp	planations	of Legal	Compliance and	the Tests of Soundness
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Sound?	· · · · · · · · · · · · · · · · · · ·	Ye	es 🗆		No	X.
Complies	with the Duty to	Ye	es 🛚		No	
Cooperat		[
Please tick	as appropriate					
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5. If you	consider the Local I	Plan is	unsound,	is it be	cause it is not:	
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	Prepared?		<u> </u>	<u></u>		
Justified?			X			
Effective'			3			
Consiste	nt with National Pol	icy?	X			
6. Please	give details of why	you c	onsider th	e Local	Plan is not lega	Illy compliant or is unsound
or fails to	comply with the du	ty to c	ooperate.	Please	be as precise a	s-possible.
* .						the state of the second sections and the second
If you wis	sh to <u>support</u> the leg	jal con	ripliance o	rsound	ness of the Loc	at Plan, please also use this
box to se	t out your commen	SAJOR	Carlos San San San		of the two	to planting at the second of the second
						
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populatio	n of St Helens has	decline	ed since 1	981. W	here are all the	extra people coming from?
One of th	e purposes of the (Green !	Belt is to a	assist in	urban regenera	tion by encouraging the

recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt

will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. I have lived in Garswood/Simms Lane End for seventy years. There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HA. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

PAOS.

• •

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

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Policy Paragraph / diagram / table Policies Appraisal Appraisal Regulation Assessment Policies Strategic Environmental Assessment Regulation Assessment Please Strategic Environmental Assessment Please Strategic Environmental Assessment Please Regulation Assessment Regulation Assessment Regulation Assessment Please Regulation Assessment Regulation Regulation Assessment Regulation Re	3. To which p	part of the Local P	an does this	represe	ntation relate?	tana alah jarah sahiji kecama ayan ili ada k
Other documents (please name document and relevant part/section) 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: **Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness **Legally Compliant?** Yes	Policy	Paragraph	Policies		Sustainability Appraisal/	Habitats
Other documents (please name document and relevant part/section) 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: **Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness **Legally Compliant?** Yes	12ADL	/ table	,	IHS	Strategic	Assessment
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sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. I have lived in Garswood/Simms Lane End for seventy years. There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1H. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

CH!

30A 83



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

			Please continue on a separate sheet if necessary
Pleas	se note your representation should cover s		
	orting information necessary to support / ju		
	ication, as there will not normally be a sub		
	sentations based on the original represent		
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8. If y	our representation is seeking a modification	n do y	you consider it necessary to participate at
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who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

(33)

46, Crantock Grove, Windle, ST.HELENS, Merseyside. WA10 5EJ

FAO Government Planning Inspector,

Local Plan, St.Helens Council, Town Hall, Victoria Square, ST.HELENS, Merseyside. WA10 1HP

Monday, 4th March 2019

Ref. Response to St. Helens Local Plan 2020-2035 (Submission Draft)

Dear Sir or Madam,

This letter represents my objections to the St.Helens Local Plan (2018). I object to the decisions made regarding Housing Need (LPA05) and the Green Belt Review.

In my view the Local Plan is <u>not justified</u> as it is based on flawed methodology. The housing targets proposed are based on outdated statistics i.e. ONS2014, when there are more accurate statistics available as in ONS2016. The ONS2014 prediction for housing need is 486 houses per year while ONS2016 predicts a lower number of 393 houses. This lower figure, together with the Brownfield Register availability of 5808 houses, would lower the identified need and therefore reduce the need for building on Green Belt.

I believe the Local Plan <u>not</u> to be <u>effective</u> and therefore not deliverable for a number of reasons:

- (i) It promotes unsustainable traffic growth as the development of site HS8 with 1000 houses, releasing 1800 cars on to the roads in an area already beset with traffic problems, would exacerbate traffic difficulties. The IDP (Infrastructure Development Plan) refers to current road improvements but does not indicate how road improvements are to be made or funded.
- (ii) With this increase in traffic there would be a negative impact on air quality, noise, tranquillity and general health as the Local Plan does not promote less vehicle dependency with its proposals for edge of town developments.

(iii) The IDP doesn't detail the impact on Healthcare and Education; how this will be managed and funded is vague or not included.

The Local Plan is not consistent with National Policy as it does not

satisfy the following:

(i) The criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs in the 'out of town' proposed building sites.

(ii) Sustainable housing. The targets proposed are based on aspirational

and unrealistic growth predictions.

(iii) Effective land use by concentrating on Green Space development as opposed to town centre development with high densities.

(iv) Food security by ignoring Agriculture Land Quality. Loss of Grade 1 and 2 Agricultural land that comprises most allocated and safeguarded sites is not mentioned in the Local Plan, nor the negative impact on farm and distributive jobs.

When the negative responses to these criteria are examined it is evident that there are no 'exceptional circumstances' to change Green Belt boundaries. The economic analysis is questionable and other reasonable alternatives to the release of Green belt must be fully explored. In my opinion there is no justified requirement to release Green Belt and, therefore, the Local Plan must be amended and modified.

Yours Sincerely,

Ralph Davies

Representor Details

Web Reference Number	WF0309
Type of Submission	Web submission
Full Name	Mrs Carole Dawson
Organisation	
Address	44 Hawthorn Drive Eccleston St Helens WA10 5EF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 LPA06
Paragraph / diagram / table	El Floo
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	·
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No	
Is sound?	No	
Complies with the duty to cooperate?	No	

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. The Plan is not effective.

The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

Residential vehicle ownership in St Helens will grow significantly with this plan. As most of the City Regional and adjoining authorites are adopting a similar growth strategy this will be mirrored across the whole of the North West.

The Northwest has recently been identified as the most congested area outside of London, a fact most of you have experience of. So with the growth of the super-port and logistics warehousing HGV, LGV and residential traffic will demand massive highway infrastruture improvements. The

Infrastructure Delivery Plan (IDP), however does not indicate how this is to be done, outside of the current ongoing improvements.

The current "improvements" to Windle Island (next door to the 8HS site) are intended to facilitate the smooth flow of traffic along the A580 between Liverpool and Manchester. These improvements are unrelated to Local Plan proposals.

Currently there is a proliferation of giant warehouses being built between Stonebridge Park, Knowsley and Florida Farm at Haydock driven by the the Northern Powerhouse initiative. These giant warehouses lie along along a 10 mile stretch of the A580 between the M57 and M6 motoways and are actively being marketed as having direct access to Liverpool and Manchester as well as to the national motorway network.

When the Port of Liverpool becomes fully operational we can expect an excess of 300% increase in HGV traffic on the A580.

Safeguarding land 8HS for the future development of 1000 houses with an estimated addition of 1800 cars seeking access to the A580 will cause an unacceptable impact on highway safety and the cumulative impacts on the road network would be severe.

The National Planning Policy Framework (NPPF) 2018 requires all plans to be sustainable and in the case of transport and infrastructure, para 109 states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

7. Please set out modification(s) you consider are necessary

Develop the Infustructure Delivery Plan to explain the impact on Roads networks, Health Care and Education

Adopt the ONS(2018) housing need statistics and remove all Green Belt reallocation from the Plan. This will remove site 8HS which will reduce the ever increasing demand on an already failing road network at Windle Island and the A580.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 3:38:51 PM
nesponse bate	

Representor Details

Web Reference Number	WF0311	
Type of Submission	Web submission	
Full Name	Mr Keith Dawson	
Organisation		
Address	44 Hawthorn Drive Eccleston St Helens WA10 5EF	
Agent Details		

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

LPA05 LPA06

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

St Helens is a post industrial town which has adequate Brownfield and Contaminated land which could easily meet the proposed housing need. The inclusion of Green Belt in the plan, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. This Plan is not justified. The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. There will be more and more post industrial sites becoming available over the next 15 years as the town continues to lose investment- why does vast areas of greenbelt land such as HA16 have to be 'safeguarded' in the plan when the need for building here will be unnecessary given the amount of brownfield available both now and in the future.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites in the plan and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into





use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

7. Please set out modification(s) you consider are necessary

There is adequate brownfield land in St Helens to develop and meet the housing need. An update of the Brownfield register to include Brownfield and PDL that is not included is necessary to show no need for greenbelt release.

Include in the plan sites which are lowest priority contaminated land to be remediated should housing need not be met, removing the need for 'safeguarded' sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 2:49:31 PM





St Helens Borough Local Plan 2020 - 2035 - Submission Draft.

The following comments are made in response to consultation on the St Helens Borough Local Plan 2020 - 2035 - Submission Draft on behalf of Cllr Joe De Asha Rainhill Ward Councillor in line with my residents/constituents concerns.

Policy LPAO6: Safeguarded land proposes to safeguard site 3HS Eccleston Park Club, Rainhill Road, Eccleston for future housing devepoment.

Whilst I appreciate that no development is proposed on the site prior tp 2035, should the site be considered for future development I wish to place on record that my concerns are the same has my constituents/residents that future development would:

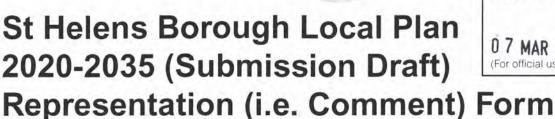
- 1. Lead to additional traffic congestion on roads that are already at breaking point, especially with the major development not a mile away and the High School looking at expansion.
- 2. The additional traffic will make the whole area of Rainhill Road from the Golf Club site to the junction of Warrington Road dangerous for both pedestrians and vehicles alike.
- 3. All schools within the Village of Rainhill and the surrounding area are at capacity and this development (if allowed) would put more pressure on them as well as nursery provision.
- 4. The pressure on Doctors, Dentists and Hospital places will come under even more pressure if this location was ever allowed to be developed for housing.

- 5. We are told every day that the country is suffering from "Air Pollution", consequently this area of Eccleston/Rainhill will come under such pollution if this location was ever allowed to be developed.
- 6. This community amenity will be lost forever if we allow it to be developed.

Unless all the above concerns are addressed I consider policy LPAO6 to be unsound as future development on this site would not adequately address the needs of the area and would not constitute sustainable development.

Cllr Joe De Asha





Ref: LPSD

0 7 MAR 2019 (For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: AMPREW BRAN	Title: First name:
Last Name: DEAN	Last Name:
Organisation/company:	Organisation/company:
Address: 3 THE CLOISTERS ECCLESTON STHELENS	Address:
Postcode: WAIO SEJ	Postcode
	Tel No:
Mobile No:	
Email:	Email:
Signature:	Date: 28 2 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local	Plan does this repre	sentation relate?	
Policy & S Paragraph/diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/se			
4. Do you consider the St Held Please read the Guidance no			ne Tests of Soundness
Legally Compliant?		Yes 🔀 No	
Sound?		Yes 🔀 No	
Complies with the Duty to Coop	perate	Yes 💹 No	
Please tick as appropriate			
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Effective?	X (NO THE PLAN IS NOT	ON FLAWED METHADAY DELIVERABLE LY WITH NPPF 2018
Consistent with National Policy	?	No it DOES NOT COMP	LY WITH NPPF 2018
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FROM LOCAL TRASPORT HUBS.

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will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

	8. If your representation is seeking a modification; do you consider it necessary to participate the oral part of the examination? (the hearings in public)			
V	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination		

If you wish to participate this to be necessary:	at the oral part	of the examin	ation, please outl	ne why you consider

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



{In Archive} St Helens Local Plan (LPSD - area 8HS Barry Dearden to: planningpolicy 19/02/2019 22:45

Stre 8HS AU-POLICY LPAGE

To the Chairman
St Helens Borough Council
Planning Policy Committee (LocalPlan)
Town Hall
Victoria Square
St Helens
WA10 1 HP
19 February 20119

Dear Sir or Madam,

Reference the proposed plan for area 8HS which is the farm land south of the east Lancs road A 580 between Houghton's Lane and Crantock Grove near Windle Island Junction I would like to comment as follows

- A) As you are fully aware the so called improvements to what is commonly known as Windle Island at the junction of East Lancs Road and Rainford Road / Rainford By Pass Junction is highly unlikely to make much difference to the traffic flow unless there are somehow filter lights as the traffic as your highways know is currently fully stretched and the date was made public but I cannot remember the exact figure. The Florida Farm development is also going to pull much more traffic to and from the port of Liverpool / Bootle as this will be the easiest route via the Switch Island routing onto the motorway onto the east Lancashire road at Kirby intersection. The Alternative routing will be from Switch Island to the Motorway routing to Wigan but coming off at the Ormskirk end of the Rainford By Pass.
- B) It is planned by west lancs area planning to build a New Industrial area and a large number of houses at the Ormskirk end of the Rainford By Pass were the Switch Island Bootle to Wigan Motorway junction is located which will also increase the Commercial and Domestic traffic flow resulting in increased traffic through Windle Island Junction.
- C) Houghton's Lane is again a very narrow road with the stretch between what was the Carmelite and the East Lancs Road is very dangerous particularly at night due to the drainage ditch on the left when traveling towards the east lancs road from the Carmelite. This route is extensively used to either short cut to Liverpool or Rainford via the island just in the direction of Kirby. This is also used as a route to turn towards the direction of Manchester to go to



Rainford / Shemersdale / Wigan / Leigh / Billinge and the M6 Motorway.

- D) Increased traffic going from the Carmelite to in effect the Island at the end of Chapel lane Eccleston is already overloaded going to St Helens as you already know having constructed TWO islands to try to smooth out the traffic which is very ineffective at peak times particularly when Children Going and Coming home from School.
- E) There is also the increased Public Bus Traffic in the morning for Children Travelling to and from Rainford High School through the Windle traffic lights and waiting to collect students in the morning at the top of bleak hill close to the Tesco / Rainford Road Junction.
- F) It is logic that if 1027 Houses are constructed in this area that on average looking at national statistics that there will be a minimum of 2 Motor Vehicles per Household and there will be probable 3 Children of School Age so I ask you to also consider were
 - The additional traffic of 2520 cars are going to exit the area as there are basically access only via Houghton's Lane, Chapel Lane, East Lancs Road or up Bleak Hill and associated local connection roads
 - 2) These cars will have to fill with Fuel and on the basis of say 2/3 using the local services can Tesco at the Junction service this number of cars with the closing of some of the exits from there site as the junction across Rainford Road to Bleak Hill is very dangerous and without some form of traffic control this will be EXTREAMLY Dangerous.
 - As it stands now even though we are supposed to have High Speed Internet this is not the case and at times it is very slow.
 - 4) The Schools you have recently confirmed from 2020 that Bleak Hill school will have another 90 places but where will the other children being about 3 per household gives a total of around 3780 Children of different ages to be educated as you would as St Helens Council education department theoretically place the balance of students 3690 be placed as Rainford High School cannot provide the places and even if the seniors can be partly accommodated by the different faith schools there is going to be a very large shortfall of places or parents will have to transport their children to Rainford Road or out to near Eccleston Mere but you I would suggest should discuss with the Education department of the Council how they can or intend to cope.
- G) There is Medical Services where are the Doctors services as everybody I know in the Eccleston / Windle area all have to go to Doctors surgery's at places like the Low House LHRC Centre in Crab street or other locations in the Town Centre as there are no local surgery's in the area to my knowledge. Pharmacies it is necessary to go to the end of Knowsley Road or to Greenfield Road and for Non drivers this is a major problem as the Local Bus service is spasmodic.

- H) For domestic shopping there is locally only Tesco at Windle Island, Texaco Service station (old Caldo service station on the east bound side of the East Lancs Road or in Warmsley Road or Coronation road or the next id Greenfield Road so not sufficient supply or choice resulting in increased traffic to St Helens via Dentons Green / Greenfield Road or Knowsley Road or traveling to Prescott. You already have problems with the town centre retail shop occupancy and with increased traffic coming into the centre from the outer areas you need to provide additional parking space.
- I) Air Pollution with the already increased pollution from the traffic increase on the East Lancs Road traffic increase and this additional pollution from this increase of 1027 housing units I ask the question – HOW IS ST HELENS COUNCIL GOING TO MEET THERE STATUTORY REQUIRMENTS ON AIR POLUTION as the residents will arrange to monitor this and take appropriate legal action if necessary.
- J) Where are you going to provide the facilities for Sewage / waste water, fresh drinking water, electric and gas services as from memory the major water Supply line which comes from Eccleston Lane Ends across this area as it continues towards Ashton in Makerfield.

I think and recommend that you should very carefully consider these points before you state you will safeguard this land as it should maybe have very limited development but not to the level stated in your policy and should NOT BE REMOVED FROM THE GREEN BELT

Best Regards
David M B Dearden
6 Moss Lane
Windle
St Helens
WA11 7QD

, Daob

1-LPA06 2-Paga 1.7.2 DTC

Representor Details

Web Reference Number	WF0475
Type of Submission	Web submission
Full Name	Dr Hannah Denno
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Green belt land in Windle	
Paragraph / diagram / table	Site 8HS	
Policies Map		
Sustainability Appraisal / Strategic Environmental Assessment		
Habitats Regulation Assessment		
Other documents		

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I believe the estimated housing need is too high, and that the figures are based on incorrect—assumptions, there are therefore no exceptional circumstances to justify use of Green Belt Land.

Other local options have not been sufficiently explored such as the use of previously developed land nearer the town centre. This land needs to be reclaimed and used for housing this would enhance the appearance of the town centre in a more sustainable way that did not need new infrastructure. This is an area with ecologically diverse habitats which is used for recreation and leisure.

The Council have failed to cop-operate with other councils and have not published any statement(s) = of common ground.

- 7. Please set out modification(s) you consider are necessary
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/18/2019 6:23:27 PM	

()-LPAO6 (2)-LPAO4

Representor Details

Web Reference Number	WF0172
Type of Submission	Web submission
Full Name	Mr Michael Dennett
Organisation	
Address	17 Sandfield Road Eccleston St Helens WA10 5LR
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is a disgrace to be giving up greenbelt land for housing when there is so much brownfield land available within the town. Past sites such as The Shires had to be cleared and treated to build on and this could be done again with numerous plots around the borough. Knowsley council did this with the old BICC site so it can and should be done first.

The roads around proposed site 8HS are already gridlocked at rush hour and the works at Windle Island have turned Eccleston roads into a rat run, an extra 1000+ cars a day cannot be sustained. It takes weeks to get a Doctors or Dentist appointment and the local schools are at bursting point with the projected admittance of children who already live here nevermind an extra 1500 families. St Helens council are using old statistics to try and pull the wool over peoples eyes about how many house are actually needed, they are using stats from the ONS(2014) stating 486 a year will be needed to meet housing needs when a more up to date report from 2016 states that it's actually 383 needed!!

The greenbelt should be saved for future generations to enjoy and not have a town that was once green to look at and just be left with 1000's of hectares of post industrial mess to enjoy!! The loss of grade 1 and 2 agricultural land which has been farmed for over 100 years is a joke when we don't know what is going to happen with Brexit.

The land 8HS south of A580 is used by the community to walk and exercise in and around.

It makes me laugh how on one hand in the councils propaganda magazine St helens first, they are	
talkin about "The year of environment" with a councillor quotting "The council is fully committed to	0
this initiative which is a great opportunity for members of the public to get out in our beautiful parks	U
and OPEN SPACES" and then on the other hand trying to take it away.	
The plan is not effective and is just a back door to building in high council tax areas.	
They are living in a dream world with completely made up assumptions about jobs being created and	3
the house they will build in the greenbelt will not alleviate the so called housing crisis as the jobs	2
provide in warehousing are minimum wage roles.	J)

7. Please set out modification(s) you consider are necessary

All green belt land should be retained for future generations.

Re-develop brownfield and PDL sites- it can and should be done and there is plenty of evidence in the surrounding areas- Southport developing an old landfill site.

If brownfield sites are not developed we will be left with derelect old industrial sites, whilst the beautiful green belt has gone for greedy house builders and the council letting this happen in the HIGHER COUNCIL TAX BANDS!!

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 5:50:31 PM
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Representor Details

Web Reference Number	WF0307
Type of Submission	Web submission
Full Name	Mr Kevin Dennett
Organisation	
Address	32 Crocketts Walk Eccleston St Helens WA10 5DU
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

8HS is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is noisy and polluted.

The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the St. Helens Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use. It cannot be sound policy to sacrifice Green Belt and productive Farmland whilst leaving town centre sites to further decay and decline.

The site has a brook (Windle Brook) running through it. This lies on a flood plain and any development would need to take this into consideration.

The local Primary and Secondary schools are oversubscribed. New schools will be required and there is nowhere to build them.





8HS is not well serviced by public transport. The train stations are in town, over 4 miles away. The current buses do not connect Eccleston and Windle with employment areas.

The Local Plan Submission Draft is based on flawed employment forecasts and cannot be supported by historical facts.

- 7. Please set out modification(s) you consider are necessary
 8HS should be changed from the safeguarding for development category and maintained as Green
 Belt for the reasons above.
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

 No, I do not wish to participate at the oral examination
- 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

V
19 4:07:36 PM
4

Representor Details

Web Reference Number	WF0308	
Type of Submission	Web submission	
Full Name	Mrs Michelle Dennett	
Organisation		
Address	32 Crocketts Walk	
	Eccleston	
	St Helens	
	WA10 5DU	
Agent Details		

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

St Helens has adequate Brownfield and Contaminated land which could easily meet the proposed housing need. The inclusion of Green Belt, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. This Plan is not justified.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 49 ha and 53 ha (contributing to an overall total of 143ha) are being reclassified as safeguarded land sites in the plan and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. The Plan is not effective.

The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

Residential vehicle ownership in St Helens will grow significantly with this plan. As most of the City Regional and adjoining authorites are adopting a similar growth strategy this will be mirrored across the whole of the North West.

The Northwest has recently been identified as the most congested area outside of London, a fact most of you have experience of. So with the growth of the super-port and logistics warehousing HGV, LGV and residential traffic will demand massive highway infrastruture improvements. The Infrastructure Delivery Plan (IDP), however does not indicate how this is to be done, outside of the current ongoing improvements.

The current "improvements" to Windle Island (next door to the 8HS site) are intended to facilitate the smooth flow of traffic along the East Lancs Road between Liverpool and Manchester. These improvements are unrelated to Local Plan proposals.

Currently there is a proliferation of giant warehouses being built between Stonebridge Park, Knowsley and Florida Farm at Haydock driven by the the Northern Powerhouse initiative. These giant warehouses lie along along a 10 mile stretch of the A580 between the M57 and M6 motoways and are actively being marketed as having direct access to Liverpool and Manchester as well as to the national motorway network.

When the Port of Liverpool becomes fully operational we can expect an excess of 300% increase in HGV traffic.

Safeguarding land 8HS for the future development of 1000 houses with an estimated addition of 1800 cars seeking access to the A580 will cause an unacceptable impact on highway safety and the cumulative impacts on the road network would be severe.

The National Planning Policy Framework (NPPF) 2018 requires all plans to be sustainable and in the case of transport and infrastructure, para 109 states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. Predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over supply of housing. The figures quoted in the plan should be replaced by the ONS (2018) which uses more current data. St Helens Council have stated in public arenas and the local press that house building is needed to provide Council Tax income. The use of old data is to justify this stance. Hence the plan is



not positively prepared.

St. Helens has relatively high unemployment rate compared to the other Local Authorities in the North West, with a 7.1% rate. There is no mention of policies to try and reduce unemployment rates to boost jobs for residents living within St. Helen. A 1%age point reduction, for example, would reduce the numbers of new dwelling needed by some 50 dpa.

Even without any change in jobs over the projection period, the population change (due to ageing) is driving a large increase of the housing growth, a point acknowledged in Section 6.3.5 of the Local Plan Update . Assuming the ONS SNPPs are in the right ball park for the 75+ age group and bearing in mind that only small numbers of the 75+ age group move, then 367 of the total housing growth comes from the 75+ age group (from the 2014 SNHPs). That would leave 486 - 367 = 119 dwellings for new jobs.

However, in order to accommodate 7,797 new jobs (Table 9, SHMA Update - Scenario 2 - Option 3) it would require a huge boost to the working age population. In rough terms, an extra 11,900 16-74 population (assuming 67% Economic Activity Rate and no change to unemployment rates or commuting rates) which translate to around 16,000 people (the 16-74s make up 70% of the total population) or an extra 940 people per annum (All ages). If you feed an extra 940 people each year into the population and household projections, this generates a household population of 930 (less Institutional Population of 1.1% as at 2033 - 2014 SNHPs) divided by the average household size (AHS) in 2033 (2.17, 2014 SNHPs) and vacancy rate of 3% gives 440 dwellings pa to add to the 367 for the 75+ which gives 807 dpa.

The numbers of dwellings (and population) arising from the extra 7,797 jobs would be well above what is projected due to the age structure of St. Helens where the 75+ age group accounts for 71% of the increase. There is a clear disjoint in the relationship between jobs, dwellings and population.

7. Please set out modification(s) you consider are necessary

The points raised throughout the Green Belt Review (2018) clearly show inconsistencies with subjective scoring and findings. It's is almost as if some of the parcels of land have been pre-selected for safeguarding or discounting and then the scoring, findings and rationale documented to produce the desired results.

There are no exceptional circumstances to justify not using the standard method for Housing need. The economic analysis is flawed and based on over-optimistic assumptions, the level of land needed is therefore not as high as set out in the Local Plan, therefore there are no exceptional circumstances to change Green belt boundaries.

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land.

These alternatives will have less impact on the environment and lead to less need for new infrastructure.

The Council have failed to cop-operate with other councils and have not published any statement(s) of common ground.

For these reasons and unless the plan is significantly modified it will fail both the legal tests it has to pass and the tests of soundness

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representor Details

Web Reference Number	WF0441
Type of Submission	Web submission
Full Name	Mrs. SHEILA DEVENISH
Organisation	LOCAL RESIDENT
Address	40 CALDERHURST DRIVE
	WINDLE
	ST. HELENS WA10 6ED
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

	•
Policy	LPA06
Paragraph / diagram / table	8HS
Policies Map	8HS
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan is UNSOUND .for the following reasons:

- 1. It is based upon flawed information and aspirational housing needs. The Councils's predicted housing need was based upon a forecast made in 2014 for a minimum of 486 houses per year. The ONS prediction now (in 2016) is for a need for 383 houses per year.
- 2. It is not deliverable. The access for the additional vehicles associated with a capacity for 1027 dwellings cannot be accommodated by the existing roads, particularly Houghtons Lane, Lynton Way, Calderhurst Drive and the A580.
- 3. It does not comply with NPPF2018 because the adverse effect on traffic growth and the Community Infrastructure would be unsustainable.

7. Please set out modification(s) you consider are necessary

Abandon the "safeguarded" status of the area and revert to the protected status of Green Belt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/25/2019 4:49:13 PM
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Representor Details

Web Reference Number	WF0442
Type of Submission	Web submission
Full Name	Mr. Michael Devenish
Organisation	Local Resident
Address	40 Calderhurst Drive
	Windle
	St. Helens WA10 6ED
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	8HS
Policies Map	8HS
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan in respect of Area 8HS is UNSOUND for the following reasons:

- 1. It is based upon flawed methodology and aspirational housing needs. The predicted need for 486 houses per year was based upon a forecast made in 2014; the latest (2016) ONS prediction is for 383 houses per year.
- 2. It is not DELIVERABLE. The access for the additional vehicles associated with a capacity for 1027 dwellings could not be accommodated by the existing infrastructure, particularly Houghtons Lane, Calderhurst Drive and the A580.
- 3. It does not comply with NPPF2018 because the effect on traffic growth and the Community Infrastructure would be unsustainable.

7. Please set out modification(s) you consider are necessary

Leave area 8HS as part of the Green Belt - not "Safeguarded for Future Development".

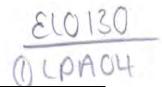
8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:



St Helens local plan Gill Dickinson to: 'planningpolicy@sthelens.gov.uk' 12/03/2019 21:07



To whom it may concern

I wish to object in the strongest possible terms to the local plan which will remove tracts of land from the Green Belt in the area of Parkside and beyond. Brown field land should be used in preference. There are no special circumstances that warrant this removal as the rail terminal has not been specifically sited in the plan. No reference has been made to surrounding villages in adjacent local authorities who will bear the brunt of congestion and increased air pollution in an area already of very poor air quality.

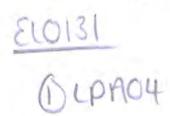
Regards John Dickinson 9 Winwick Lane Lowton Warrington WA3 1LR





Fwd: St Helens local plan John and Gill Dickinson

planningpolicy 12/03/2019 21:11





I wish to object to the St Helens local plan which will remove tracts of land from the Green Belt in the area of Parkside and beyond.

Regards Gill Dickinson 9 Winwick Lane Lowton Warrington WA3 1LR

Representor Details

Web Reference Number	WF0393
Type of Submission	Web submission
Full Name	Mrs Hilary Dilworth
Organisation	
Address	90 Higher Lane
	Rainford
	St. Helens WA11 8AL
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Greenbelt / New housing in Rainford
Paragraph / diagram / table	
Policies Map	site ref 8AH
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The proposal to build 259 new houses on Greenbelt land is unjustified. The area in question is grade A agricultural land. Greenbelt land should only be release in exceptional circumstances. Once this is handed over to developers it can never be used for food production again. The Greenbelt around St Helens also provides a 'green lung' to a town with significant health problems.

Greenbelt land needs to be protected while there are alternative Brownfield sites available in the Borough.

This particular development is also unsound as no extra schools or medical facilities have been proposed. Extra traffic in this area would be chaotic.

I am also concerned about the proposed development potentially contributing to the risk of flooding along Rainford Brook. There is a need to slow the flow of rural headwaters, not make matters worse. Safeguarding countryside from encroachment should be paramount while assisting urban regeneration should be done by recycling derelict land.

7. Please set out modification(s) you consider are necessary

New housing and industrial development should take place on regenerated Brownfield sites in the Borough. There are sufficient such areas and they should be used first. The council's own register shows there is enough brownfield land in St Helens for 5,818 houses.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

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Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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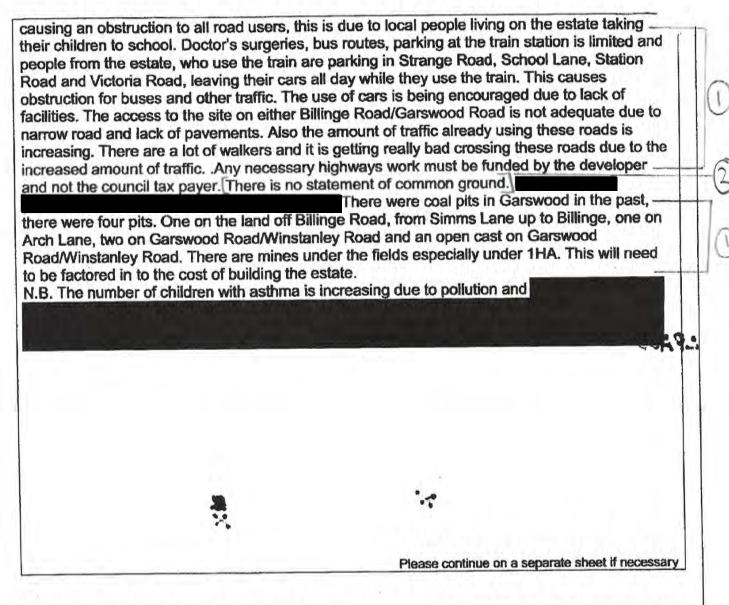
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Other documents (please name document and relevant part/section) 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Sc Legally Compliant? Yes No Sound? Complies with the Duty to Yes No Cooperate Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared?	oundness
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6. Please give details of why year consider the Local Plan is not legally compliant or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please box to set out your comments.	in an experience of the second

estate as the school run on the estate is very chaotic, with cars parked around the school



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say they this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

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Policy	part of the Local f	Policies		Sustainability	Habitats
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One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt

will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school —

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. . Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. I have lived in Garswood/Simms Lane End for seventy years. There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HS This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and

Please continue on a separate sheet if necessary

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who have indicated that they wish to participate at the oral part of the examination

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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

1 3 MAR 2019

(For official use only)

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	e stages of the St Helens Borough Local Plan 2020-203 on, publication of the Inspector's recommendations and
Yes (via email)	☑ No
	method of communication. If no email address is provid

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CLARIFICATION IS NEEDED ON THE NPPF METHOD OF COLCULATING HOUSING NUMBERS (2016 OR 2018) UNTIL THIS HIGHLY ASPIRATIONAL IS MODIFIED ON A REGIONAL AND NOT NATIONAL BASIS - NO FURTHER PROGRESS SHOWD BE MADE.

Please continue on a separate sheet if necessary

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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Dear Sirs

This continuation sheet is further to my Representation/Comment form.

I believe that this Submission Draft does not satisfy the requirement for sustainable development because the plan promotes increased car dependency, the housing targets are based upon outdated NPPF guidelines, are extremely aspirational, and ignores the requirement to preserve food security by ignoring Agricultural Land Quality and the demand for green spaces as a community requirement.

<u>Employment Land</u>: I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

<u>Brownfield sites</u>: St Helens Council states that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. Monies were available via the Liverpool City Council for this purpose. I have not seen any report of the Council's effort to bid for these monies, successful or not.

<u>Traffic Issues and Duty to Cooperate</u>: St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private car to the new business estates, mainly along the A580 as there is no existing public transport nor any published plans for the future. The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions and the Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable.

Windle Island: The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction. As part of the Northern Powerhouse initiative, it is proposed to build 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool.

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) – "Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

This is echoed in the Council's own proposed submission draft (LP01 sec 4.25) which includes the following:

"3. New development will only be permitted if it would: a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services."

To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure.

Community Infrastructure: Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity or to visit local supermarkets. Because of these difficulties, many non drivers and disabled residents have to shop online, thus bringing more delivery vans into the existing local area. The idea of building a further 1100 houses is totally unsustainable.

I feel that a suitable alternative to this plan would be to maintain the farming activity, thus protecting our food supply (especially in the face of Brexit uncertainty), Plant wildflower corridors within the crops and deciduous trees around the perimeter of this land, providing a carbon sink to offset the effects of the increased pollution that the extra traffic will bring.

Taking into account all these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure and the land should be better used for environmental protection.

Yours sincerely

Mrs E Dodd

24 Nicoll Rd, Eccleston St Helens

SUCKAC JOS!

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1 2 MAR 2019





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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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3. To w	hich par	t of the Local Pla	n does this	representa	tion relate?	
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ST. HELENS TO PROVIDE EVIDENCE THAT
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OUTLINE BENEGITS OF PROPOSAL,
TO ENSURE ALL CALCULATIONS ARE
CORRECT FOR THIS PROPOSAL TO ENSURE
IT WILL BENEFIT WILDLIFE, RESIDENTS,
ROADS AND SUSTAINABILITY OF THE
COMMUNITY.

Please continue on a separate sheet if necessary

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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Loc	al Plan does this rep	presentation relate?	
Policy LPA Paragraph/diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please na document and relevant part			
4. Do you consider the St H Please read the Guidance		al Plan 2020-2035 is: s of Legal Compliance and	I the Tests of Soundness
Legally Compliant?		Yes No	DON'T KNOW
Sound?] Yes □No	
Complies with the Duty to Co	poperate	☐ Yes ☐ No	
Please tick as appropriate			
5. If you consider the Local Please read the Guidance		it because it is not: of the Tests of Soundness	s
Positively Prepared?		V	
Justified?		9	
Effective?	Ţ.	7	
Consistent with National Police		X	add for the second
6. Please give details of whor fails to comply with the		ocal Plan is not legally o	

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

ST. NIELENS COUNCIL HAVE NOTOSTIFICATION

FOR THIS SITE REGARDING THE SCALE, THE POSITION OF SITE CLOSE TO RESIDENTIAL AREA DEVALUATION OF RESIDENTS PROPERTYS, NOISE AND TRAFFIC POLLUTION. REDUCTION IN GREEN SEAT LAND WHAT WAS ARESIDENTIAL AREA PERA IS FAST BECOMING AN INDUSTRIAL SITE. THIS SITE WILL ALSO ADD TO THE PROBLEMS OF CLOODING, CLIPSLEY BROOK IT EAST LANCE ROAD.

compliant or sound, having regard to the n relates to soundness (NB please note that incapable of modification at examination). the Local Plan legally compliant or sound.	nsider necessary to make the Local Plan legally natter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your or text. Please be as precise as possible.
ALSO TO REDUCE	SHOULD BE BUILT AWAY AREAS TO ENABLE THE BELT LAND TRAFFIC CONGISTION TION TO RESIDENTS LLBEING TO RESIDENTS O CONSIDERATION.
Please note: your representation should cover sunformation necessary to support/justify the repre	Please continue on a separate sheet if necessary uccinctly all the information, evidence and supporting esentation and suggested modification, as there
vill not normally be a subsequent opportunity to r	make further representations based on the original
epresentation at the publication stage. After this stage, further submissions will be or and issues he/she identifies for examination.	nly at the request of the Inspector, based on matters
	ation; do you consider it necessary to participate at
8. If your representation is seeking a modification the oral part of the examination? (the hear	HEREN HOLD NEW
그리네는 내는 내투자가 있다면 보다면 투자를 하는 지역되어 되어 가면 지어난 시간에 가면 하는 것이다. 그런 아이를 통하는 생각을 하게 하는 데이터를 하는데 없다.	HEREN HOLD NEW

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0463



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

2 Your Agent's Details (if applicable)

3 MAR 2019

(For official use only)

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Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

address is provided, we will contact you by your postal address.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First NameELIZA BETH	First name:
Last Name: Do DsoN	Last Name:
Organisation/company: N A	Organisation/company:
Address: 44 hakeside Gardens Rainford	Address:
Postcode: WAII 8 HH	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date:
lease be aware that anonymous forms cannot omments to be considered you MUST include	be accepted and that in order for your your details above.
Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption of	Plan for examination, publication of the
Yes 🗹 (Via Email)	No 🗌
Please note - e-mail is the Council's preferred	method of communication. If no e-mail

RETURN DETAILS

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post to:

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Town Hall

Victoria Square

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Telephone:

01744 676190

NEXT STEPS

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Policy	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental	Habitats Regulation Assessment
	uments (please nam and relevant n)	e 8HA NA AND EAS	Assessment Not south of 1	tigher han E han E, RAINFORD
			Plan 2020-2035 is: egal Compliance and the	Tests of Soundness
Legally Co		Yes □	No □	
Sound?	Conductor Conductor	Yes □	No 🗓	
Cooperate	with the Duty to	Yes 🗆	No □	
	onsider the Local Plant the Guidance note for		because it is not: e Tests of Soundness	
Positively I		IV .	2 . Jose Dr Countinous	
Justified?	- Ar and - Ar	N/		
Effective?		Ø		
Consistent	with National Polic	y? □		
If you wish box to set of Building Risk + Agnicul especies 1 Acres of Bullon 1	to support the legal out your comments Myent ARE M AS 259 ho Wildlife Tunal lan	I compliance or so S Follows: USES ON K Presenuction d-This will	bokeny hane on, JA subs lbe chucial Fo	Plan, please also use this
Aueas.				
			Please continue on	a separate sheet if necessary

7. Please set out what modification(s) you consider compliant or sound, having regard to the matter you relates to soundness (NB please note that any notincapable of modification at examination). You will the Local Plan legally compliant or sound. It will be suggested revised wording of any policy or text. Please would suggested to suggest the suggested revised wording of any policy or text. Plant description of the suggested to suggest the suggested revised wording of any policy or text. Plant description of the suggested revised wording of any policy or text. Plant description of the suggested revised wording of any policy or text. Plant description of the suggested revised wording of any policy or text. Plant description of the suggested revised wording of any policy or text. Plant description of the suggested revised wording of any policy or text. Plant description of the suggested revised wording of any policy or text. Plant description of the suggested revised wording of any policy or text. Plant description of the suggested revised wording of any policy or text. Plant description of the suggested revised wording of any policy or text. Plant description of the suggested revised wording of any policy or text. Plant description of the suggested revised wording of	ou have identified at 6. above where this n-compliance with the duty to cooperate is I need to say why this modification will make e helpful if you are able to put forward your
suggested revised wording of any policy or text. If I would suggest Not build Is frime Agricultural land Finitely would houses outs NOT Produce A Substanti Policies.	Al Number of Jobs. to consider Alternative
<i>Monte</i>	
	Please continue on a separate sheet if necessary
representations based on the original representat	
After this stage, further submissions will be on matters and issues he/she identifies for example of the oral part of the examination? (the hearings in	ion at the publication stage. Inly at the request of the Inspector, based amination. If do you consider it necessary to participate at public)
representations based on the original representate After this stage, further submissions will be on on matters and issues he/she identifies for example 8. If your representation is seeking a modification	ion at the publication stage. nly at the request of the Inspector, based amination. ; do you consider it necessary to participate at
After this stage, further submissions will be on on matters and issues he/she identifies for example or a part of the examination? (the hearings in No, I do not wish to participate at the	ion at the publication stage. Inly at the request of the Inspector, based amination. ido you consider it necessary to participate at public) Yes, I wish to participate at the oral examination
After this stage, further submissions will be on on matters and issues he/she identifies for example of the oral part of the examination? (the hearings in No, I do not wish to participate at the oral examination) 9. If you wish to participate at the oral part of the example oral example or examp	ion at the publication stage. Inly at the request of the Inspector, based amination. ido you consider it necessary to participate at public) Yes, I wish to participate at the oral examination
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0464



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

- 1 MAR 2018

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

0 1 MAR 2019

Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: STEPHEN	First name:
Last Name: DOHERTY	Last Name:
Organisation/company:	Organisation/company:
Address: LIGO GARSWOOD ROAD ASHTON IN MAKERFIELD WIGAN	Address:
Postcode: WN4 UXJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 28.02.20A

comments to be considered you MUST include your details above.

H. H	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the
Inspector's recommendations and	
Yes (Via Email)	No 🗌

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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St.Helens Council

Town Hall

Victoria Square

St. Helens Merseyside WA10 1HP

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Please use a separate copy of Part B for each separate comment/representation.

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

Policy Paragraph / diagram / table		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other documents (please r document and relevant part/section)	name			
4. Do you consider the St I Please read the Guidance no			Tests of Soundness	
Legally Compliant?	Yes K	No C		
Sound?	Yes 🗆	NoX		
Complies with the Duty to Cooperate	Yes 🗆	No 🖔	No 🗷	
5. If you consider the Loca Please read the Guidance no Positively Prepared? Justified?	te for explanations of the			
Effective?	×			
Consistent with National P				
6. Please give details of w	ny you consider the L			
or fails to comply with the	egal compliance or so			
Not justified-the council sh population of St Helens ha One of the purposes of the	ould be put to strict p s declined since 198	1. Where are all the extr	a people coming from	

will cause significant harm to the purposes of the Green Belt. Houses in this area is not

sustainable due to the lack of school places, Doctor's surgeries, bus routes, parking at the train

Station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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	our representation is seeking a modification ral part of the examination? (the hearings in	; do you consider it necessary to participate at public)
1	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

	late at the oral part of the exam	nination, please outline why you consid
this to be necessary:		

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

- 1 MAR 2018

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Part B - Your Representation(s).

0 1 MAR 2019

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)		
Title:	Title:		
First Name: STEPHEN	First name:		
Last Name: DOHERTY	Last Name:		
Organisation/company:	Organisation/company:		
Address: L+40 GARSWOOD ROAP ASHTUN IN MAKEKFIELD WIGAN Postcode: WN H OX J	Address: Postcode:		
Tel No:	Tel No:		
Mobile No:	Mobile No:		
Email:	Email:		

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes (Via Email)	No 🗌

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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Policy PA 05	LPSD 1HA	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other do documer part/sect	nt and r	ts (please nam elevant	ne			
				al Plan 2020-2035 is:	the Tests of Soundness	
Legally (Yes X		D C	
Sound?	Joinplie	ant:	Yes 🗆		No K	
Complie			Yes 🗆		No 🗷	
Please tic			an is unsound is	it because it is not:		
				the Tests of Soundnes	S	
Positive			П			
Justified			×			
Effective			×			
		National Police				
or fails to	o comp	ly with the dut	y to cooperate. P	lease be as precise a	ally compliant or is unsound as possible. al Plan, please also use thi	

One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt

sustainable due to the lack of school places, Doctor's surgeries, bus routes, parking at the train

will cause significant harm to the purposes of the Green Belt. Houses in this area is not

Station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road and Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

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	our representation is seeking a modification ral part of the examination? (the hearings in	; do you consider it necessary to participate at public)
/	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you conside this to be necessary:			

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RO0465



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

B 0 APR 2019

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we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)		
	Title:		
	First name:		
Last Name: Dolar	Last Name:		
	Organisation/company:		
Address: 12 Douglas Aue Bold	Address:		
Postcode: WA9452	Postcode:		
Tel No:	Tel No:		
Mobile No:	Mobile No:		
Email:	Email:		
Signature:	Date: 7/4/19		
Please be aware that anonymous forms cannot considered you MUST include your details abo	be accepted and that in order for your comments to be ve.		
Would you like to be kept updated of future (namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and		
Yes (via email)	☐ No		
Please note - email is the Council's preferred	method of communication. If no email address is provided,		

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St. Helens Council

Town Hall

Victoria Square

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or by hand delivery to:

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RO0466



St Helens Borough Local Plan, 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Part A - Personal Details

Part B - Your Representation(s)

Date: 17/04/19

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Miss	Title:
	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 12 Douglas Ave Bold	Address:
St helens	
Postcode: WA9 457	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	mail:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

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Yes (via email)

Signature:

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

RO0467



St Helens Borough Local Plan , D APR 2019 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MR	Title:
	First name:
Last Name: DoLas	Last Name:
Organisation/company:	Organisation/company:
	Address:
ST HELENS	
Postcode: WA9 45Z	Postcode:
Tel No:	Tel No:
Mobile No	Mobile No:
Email:	Email:
Signature:	Date: 17 - 4 - 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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St Helens

WA10 1HP

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Telephone: 01744 676190

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

RO0468



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

2. Your Agent's Details (if applicable)
Title:
First name:
Last Name:
Organisation/company:
Address:
Postcode:
Tel No:
Mobile No:
Email:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Vac	(via email)		
163	(Via Elliali)		

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Telephone: 01744 676190

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

RO0469



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13th May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

1 3 MAY 2018

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: 上いりみ	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 14 ORCHID WAY STHELENS	Address:
Postcode: WA9 HZN	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 24/4/19
ease be aware that anonymous forms cannomments to be considered you MUST included when the second was a second with the second was a second with the second was a second was a second was a second with the second was a second wa	le your details above. ure stages of the St Helens Borough Local
Plan 2020-2035? (namely submission of th	e Plan for examination, publication of the
Inspector's recommendations and adoption	of the Plan)

Please note - e-mail is the Council's preferred method of communication. If no e-mail

address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Monday 13th May 2019 by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

RO0470



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13th May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

13 MAY 2019

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: JAMES	First name:
First Name: JAMES Last Name: DOLAL	Last Name:
Organisation/company:	Organisation/company:
Address: IH ORCHID WAY STHELENS Postcode: WA9 HZN	Address:
Postcode: WA9 HZN	Postcode:
Tel No:	Tel No:
Mobile N	Mobile No:
Email:	Email:
Signature:	Date: 24/4/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated Plan 2020-2035? (namely submission Inspector's recommendations and accommendations)	of future stages of the St Helens Borough Local on of the Plan for examination, publication of the doption of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's address is provided, we will contact y	preferred method of communication. If no e-mail you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Monday 13th May 2019 by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

RO0471



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref:	LPSI
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(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13th May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

13 MAY 2019

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: M.SS	Title:
First Name: GILLIAN	First name:
Last Name: DOL AN	Last Name:
Organisation/company:	Organisation/company:
Address: 78 Broadway St Helens	Address:
Postcode: WATO 5 DH.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature: ease be aware that anonymous forms	Date: 22.4.19 cannot be accepted and that in order for your
mments to be considered you MUST i	of future stages of the St Helens Borough Local
Plan 2020-2035? (namely submission Inspector's recommendations and add	of the Plan for examination, publication of the
Yes 🔲 (Via Email)	No 🗹
Please note - e-mail is the Council's paddress is provided, we will contact yo	referred method of communication. If no e-mail ou by your postal address.

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Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

RO0472

Representor Details

Web Reference Number	WF0450
Type of Submission	Web submission
Full Name	Mrs Alice Donnellan
Organisation	Private householder
Address	23 Oak Tree Road
	Eccleston
	St. Helens
	Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

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Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486. The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have acheived with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary Retain all Green belt areas for the future of our communities.

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Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

NB I submitted this form on 22nd Feb, but did not receive an automated reply so have re-submitted, in case the first one was not received.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 9:59:21 AM	

(1)-LPAOS @UPAOG, 8HS (3)-GEN (4)-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0462
Type of Submission	Web submission
Full Name	Mrs Alice Donnellan
Organisation	Private Householder
Address	23 Oak Tree Road Eccleston St. Helens Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

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The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

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The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather rejuvenating brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/22/2019 9:08:16 AM
---------------	----------------------

RO0473

1-LPAOS 3-LPAO6, 845 3-GEN 6-Para 172 DTC

Representor Details

Web Reference Number	WF0451
Type of Submission	Web submission
Full Name	Miss Mary Donnellan
Organisation	Private Householder
Address	23 Oak Tree Road Eccleston St Helens Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No	
Is sound?	No	
Complies with the duty to cooperate?	Yes	- 1

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government — is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place — to live. The Plan does not address these essential areas of need and concentrates instead, on house

to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

2





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Adequate regional and cross border collaboration has not been undertaken. The Housing Need - assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486. The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have acheived with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

NB: I submitted the above form on 22nd Feb 2019, but I did not receive an acknowledgement, so I have re-submitted today, in case the one from 22nd was not received.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 9:52:37 AM
The second secon	

1)-LPAOS (2)-LPAO6, 8HS (3)-GEN (4)-Pasa 1-7-2 DTC

Representor Details

Web Reference Number	WF0463
Type of Submission	Web submission
Full Name	Miss Mary Donnellan
Organisation	Private Householder
Address	23 Oak Tree Road Eccleston ST. HELENS Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

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Is sound?	No
Complies with the duty to cooperate?	Yes

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No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date 2/22/2019 8:48:05 AM

3

RO0474



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MRS.	Title:
First Name: CHRISTING	First name:
	Last Name:
/	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 7 . 3 . 19
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stag (namely submission of the Plan for examination, pu adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred meth	od of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which	h part of the Local Pla	an does this repre	sentation relate?		
Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment	
	uments (please name and relevant part/secti	on)			
	consider the St Helen ead the Guidance note		Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness	
Legally Cor	mpliant?		Yes No		
Sound?			Yes 🕅 No		
Complies w	vith the Duty to Cooper	rate	Yes 🛛 No		
Please tick	as appropriate				
	onsider the Local Plar ead the Guidance note		because it is not: the Tests of Soundness		
Positively P	repared?	\boxtimes			
Justified?		×			
Effective?		\bowtie			
Consistent	with National Policy?	\bowtie			
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the Local Plan legally compliant or sou	the matter you have identified at 6. above where this that any non-compliance with the duty to cooperate is on). You will need to say why this modification will make and. It will be helpful if you are able to put forward your cy or text. Please be as precise as possible.
	Please continue on a separate sheet if necessar
formation necessary to support/justify the re	er succinctly all the information, evidence and supporting epresentation and suggested modification, as there
presentation at the publication stage.	y to make further representations based on the original
ter this stage, further submissions will b nd issues he/she identifies for examination	ne only at the request of the Inspector, based on matters on.
3. If your representation is seeking a mode the oral part of the examination? (the h	dification; do you consider it necessary to participate at nearings in public)
No, I do not wish to participate at the oral examination	dification; do you consider it necessary to participate at nearings in public) Yes, I wish to participate at the oral examination
the oral part of the examination? (the h	Yes, I wish to participate at the oral
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

1800848M

RO0476



Response to the Local Plan for the Inspector Sue Dow to: planningpolicy@sthelens.gov.uk 09/03/2019 14:51

We would like to register our objections to St Helens Local Plan to remove land from the greenbelt. (8HA Rockery Lane)

We are disturbed about any land being removed from the greenbelt but especially Grade 1 Agricultural Land and land that is actively farmed and provides employment. The St Helens Local Plan is intended to promote employment and economic growth but this will have the opposite effect. Also there has been no consultation with Natural England over the loss of Grade 1 Agricultural land. We need fields to grow crops to feed the people who live here instead of importing so much from Europe and further afield. Not only do we need this land now but we need it in the future, especially as nationally our population is growing. Once greenbelt has been removed it can never be returned. The greenbelt was designed to prevent urban sprawl and over development which so far has worked well but the Local Plan would be detrimental to this.

Greenbelt is also good for the health of residents who can walk along the footpaths enjoying the benefits of being in the fresh air and amongst the fields. This also good for the mental health of the population. St Helens is an area with significant health problems, including heart and lung disease as well as high childhood and adult obesity rates. Diabetes is a huge problem for the UK and as Rainford has few facilities we need our greenbelt.

The Government says Greenbelt land should only be released in exceptional circumstances and there are no exceptional circumstances to change the greenbelt boundaries. St Helens Council has enough brownfield sites to use and these brownfield sites should be used to build homes on and to tidy up the often unsightly areas these sites have become. The Council wants to build 486 houses every year but figures from the Office for National Statistics show St Helens only needs 383 houses per year. If these most recent figures from the ONS are used, the amount of building could be significantly reduced. Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land. These alternatives will have less impact on the environment and lead to less need for new infrastructure.

The Council have failed to co-operate with other councils and have not published any statement of common ground.

The Council's brownfield site register reveals there is enough land for 5,818 houses. The Borough has a falling population and very low property prices and the demand for these properties is low. Building on greenbelt land is not appropriate!

The greenbelt land is a much desired commodity for the developers as it is easy and cheaper to build on than land that needs cleaning up and these are the reasons that the developers push the Council to release it from the greenbelt. These houses are much easier to sell but the prices would be much higher and of course not many homes would be affordable. The property companies are the only winners as their profits are much larger. There would be extra traffic on the roads as each house would probably have two cars and village roads are not built for large volumes of traffic and pubic transport, both train and bus, is poor.

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and test of soundness.

I would urge you to refuse this Local Plan and insist St Helens Council acts responsibly and uses brownfield land to build on which is readily available and where transport and amenities are more abundant. I hope you encourage the Council to leave the fields for crop growing in order that we can feed the population now and in the future.

Mrs Sue Dow 55 Heyes Avenue Rainford St Helens Merseyside WA11 8AW

Mr Peter Dow 55 Heyes Avenue Rainford St Helens Merseyside WA11 8AW

9 March 2019

RO0477



()-LPAOG PROOTS (2)-Statement of Common Ground X

St Helens Borough Local Plan 0 1 MAR 2019 2020-2035 (Submission Draft)

Ref: LPSD

(For official use only)

Representation (i.e. Comment) Form

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This form has two parts:

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: M/S	Title:
First Name: Louise	First name:
Last Name: Dowling	Last Name:
Organisation/company:	Organisation/company:
Address: 2 Rush Park Cottages TSland Brow	
Postcode: WAII	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 23rd FeB Za 3

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which pa	rt of the Local Pla	in does this repre	sentation relate?	
Policy North PAOL Brings Sike Brings LHS	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	nts (please name relevant part/section	on)		
4. Do you cons	sider the St Helens the Guidance note	s Borough Local F for explanations of	Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally Compli	ant?		Yes No	
Sound?			Yes No	
Complies with t	the Duty to Cooper	ate :	Yes PNo	
Please tick as a	appropriate			
		is <u>unsound</u> , is it for explanations of	because it is not: the Tests of Soundness	
Positively Prepa	ared?			
Justified?				
Effective?		9	×	
Consistent with	National Policy?			
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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Ref: LPSD

01 MAR 2019

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[- [- [- [- [- [- [- [- [- [-	Title:	
	First name:	
Last Name: Dowling	Last Name:	
7	Organisation/company:	
Address: 2 Rushy Park CoHages	Address:	
Stitletens.		
Postcode: WAIL 9PN	Postcode:	
page 1 to 1 t	Tel No:	
	Mobile No:	
	Email:	
Signature:	Date: 23 rd FEB 2019	
Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.	ecepted and that in order for your comments to be	
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	s of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and	
Yes (via email)	☐ No	
Please note - email is the Council's preferred metho we will contact you by your postal address.	d of communication. If no email address is provided,	

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St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

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	ments (please name and relevant part/secti	ion)		
	onsider the St Helen ad the Guidance note		Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally Con	npliant?		Yes No	
Sound?			Yes No	
Complies w	rith the Duty to Coope	rate	Yes No	
Please tick	as appropriate			
	nsider the Local Plan ad the Guidance note		because it is not: f the Tests of Soundness	
Positively Pr	repared?			
Justified?		9		
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Consistent	with National Policy?			
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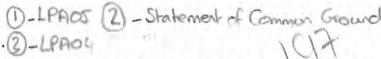
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RO0478







St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

O 1 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: 7/25	Title:
First Name: Harcene	First name:
Last Name: Downey	Last Name:
Organisation/company:	Organisation/company:
Address: 261, LIVERPOOL	RO Address:
M'510E	ens /
Postcode: WALL aRT	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date Sol 3/19
ease be aware that anonymous forms	s cannot be accepted and that in order for your comments to be tails above.
ould you like to be kept updated of	f future stages of the St Helens Borough Local Plan 2020-2035 imination, publication of the Inspector's recommendations and
Yes (via email)	□ No

Please note - email is the Council's preferred method of communication. If no email address is provided,

RETURN DETAILS

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post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

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RO0479



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	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 261 LIVERPOOL ROAD	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25/2/2019
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	accepted and that in order for your comments to be
Nould you like to be kept updated of future stage namely submission of the Plan for examination, pure adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred methors will contact you by your postal address.	od of communication. If no email address is provided,

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St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

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Policy PASS ITE HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally

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	Last Name:
Organisation/company:	Organisation/company:
Address: 261 LIVER Poor RD	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25/2/20/9
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Yould you like to be kept updated of future stage namely submission of the Plan for examination, public doption of the Plan)	es of the St Helens Borough Local Plan 2020-2035 olication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred metho	od of communication. If no email address is provided

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

Policy	Paragraph/	Policies	Sustainability	Habitats
A04	diagram	Мар	Appraisal/ Strategic	Regulations Assessment
TES	table		Environmental	Assessment
ΞA			Assessment	
EA EA EA				
Other docu	iments (please name and relevant part/secti	on)		
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	with the Duty to Coope	rate \square	Yes ☑ No	DONT
	as appropriate			
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Justified?				
Effective?		F		
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Please keep a copy for future reference.

RO0480



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

1040

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1 2 MAY 2019

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/dompany:	Organisation/company:
Address: 132 CHESTER LANE SUTTON MANOR	Address:
Postcode: WA9 HDE	Postcode:
	l No:
	obile No:
	nail:
Signature:	Date: 23-32019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes 🔀 (Via Email)	
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	

RO0481



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Part B - Your Representation(s).

1041 13 MAY 2018

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: SYLULA	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 132 GHESTER LANE. SUTTON MANOR, ST. HELENS	Address:
Postcode: WA94DE	Postcode:
1 00.0000.	Tel No:
	Mobile No:
	Email:
Signature:	Date: 23-3-19
Please be aware that anonymous forms cannot bomments to be considered you MUST include you	our details above.
Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Planspector's recommendations and adoption of the Planspector's recommendations.	an for examination, publication of the
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's preferred raddress is provided, we will contact you by you	method of communication. If no e-mail r postal address.

RO0482



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 4, Parkside Ave. Sutton manor St. Helens	Address:
Postcode: WAG 43T	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 23/3/149

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Plan 2020-2035? (namely submission Inspector's recommendations and adoptions and adoptions are submission.)	f future stages of the St Helens Borough Local of the Plan for examination, publication of the ption of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's pro address is provided, we will contact you	eferred method of communication. If no e-mail u by your postal address.

RO0483



St Helens Borough Local Plan 2020 - 2023 Representation PAUL DRAPER to:

planningpolicy 12/03/2019 22:59

1 Attachment



Paul's Planning reply.pdf

Dear sir/Madam,

Please find attached my completed representation form regarding proposed development of the Garswood area.

regards,

Paul Draper



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

lease also read the Representation Form Guidance Note that is available with this form, or online at: ww.sthelens.gov.uk/localplan

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ve will contact you by your postal address.

lease note that you must complete Parts A and B of this form.

(we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
Tel No:	Tel No:
	Mobile No:
Email:	Email:
Signature:	Date: 12.3.19

RETURN DETAILS

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Local Plan St.Helens Council Town Hall Victoria Square

St Helens WA10 1HP

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Now please complete PART B of this form, setting out your representation/comment.

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B-YOUR REPRESENTATION

ase use a separate form Part B for each representation, and supply together with Part A so we know no has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which	n part of the Local Pla	an does this repre	sentation relate?	10 E	Divisi decises	
Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	1	Habitats Regulations Assessment	1
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	compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
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Ŝ	PROADS. THE CURRENT VILLAGE OF GARSWOOD WOULD BECOME TUST AN IMPROSE ESTATE, SIMILAR TO THE NEARBY WINSTANLEY, LOSING ANY VILLAGE CHARACTER THAT MOST RESIDENTS MOVED HERE FOR.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0484



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e.Comment) Form joan draper to:

planningpolicy 12/03/2019 23:07

1 Attachment



Joan's Planning Reply.pdf

Dear Sir/Madam

Please find attached my response to the proposed development of the Garswood Area.

Regards

Joan Draper



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
	Last Name:
	Organisation/company:
GARSWOOD	Address:
ASHTON-IN-MAKERFIELD	na nem ve yeard kanapenal ea es 🗷 ili andilim
Postcode: WN4 OUF	Postcode:
Tel No: "	Tel No:
	Mobile No:
Email:	Email:
	Date: 12 \3 \ 1 9
considered you MUST include your details above.	accepted and that in order for your comments to be ges of the St Helens Borough Local Plan 2020-2035 ablication of the Inspector's recommendations and
Yes (via email)	□ No
	nod of communication. If no email address is provided

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Local Plan St.Helens Council Town Hall Victoria Square St Helens WA10 1HP

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7.	Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
(3)	GREEN FIELD SITES SHOULD NEVER BE USED WHEN THERE IS AN ABUNDANCE OF BROWN FIELD SITES WHICH COULD BE USED IN THE AREA. EVEN CONTAMINATED LAND COULD BE CLEANED UP AND USED AGRICULTURAL LAND MAY BE MORE IN NEED IN THE FYTURE ESPECIALLY AFTER BREYIT. THIS LAND IN GARSWOOD HAS BEEN THE HABITAT FOR LAPWINGS FOR OVER LO YEARS. WE COULD LOSE THEM FROM OUR AREA FOREVER
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AF	FORD TO MOVE TO A COUNTRY VILLAGE THAT THEY CHOSE TO LIDE Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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RO0485

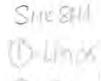
12/0093



St Helens Borough Local Plan 2020-2035 (Submission Draft) LPA02 - Site 8HA Kathryn Drewitt

to:

'planningpolicy@sthelens.gov.uk' 12/03/2019 14:00



Dear Sir,

I am writing to formally register my objections to the building of 259 new houses on Site 8HA

The 2 main reasons are simply that it is not necessary to build on this green belt land when there are other sites more suitable or brownfield sites that can be used and secondly Rainford does not have the facilities to cope with another 259 houses adding approximately another 500 cars.

The reasons for requiring extra housing in Rainford / St Helens has been shown to be based on figures that are too high and actually that amount of housing is not needed.

The figures are flawed and therefore why is Green Belt land being used and taken away? There are no exceptional circumstances to do this.

Surely other reasonable alternatives should be fully explored, including brownfield sites and other more suitable sites.

Site HA8 (Rookery Lane) is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector.

This is obviously threatened by the proposed removal of this site from the Green Belt which goes against the councils strategy to promote employment and economic growth.

Initially 6 sites around Rainford were proposed and only 4 sites scored 4 negatives on the Sustainability Appraisal and the other 3 have all been discarded so surely HA8 is one of the least appropriate Green Belt sites allocated for housing in Phase 1.

The site is also next to industrial employment land and other sites have been excluded because of similar situations to this.

In addition figures show that 936 houses in the borough were classed as being long-term empty in the most recently recorded figures in October 2017.

Council tax figures from October stated there were a total of 2,853 unused homes in the borough. Surely a priority should be to lower these figures and build less on current Green Belt land.

The building planned at the old St Helens Car Auctions site by Carr Mill Dam is a great example of using existing land to build on and improve the area instead of building on existing farming Green Belt land which is just not necessary.

This site should be removed just for all the above reasons.

In addition however, the facilities in Rainford cannot cope with this additional housing, this includes the lack of doctors and dentists and also the increased traffic it brings to the small centre which has extremely minimal parking anyway and also the increased traffic to Rookery Lane and also Thickwood Moss Lane which will now become a dangerous, major cut through to the Rainford ByPass.

There are also much better places to add additional housing around St Helens, closer to the centre, with better access to public transport and the road network as opposed to building in Rainford itself.

In summary there is no need to build on farming Green Belt when there are much better alternatives to



file:///C:/Users/GriffithsCh/AppData/Local/Temp/notes0C98C3/~web7839.htm

provide additional housing in the area.

Regards

Kathryn Drewitt 1 Rookery Drive Rainford Merseyside WA11 8BB



RO0486

Page 1 of 1

EL0002



St Helens Local Plan: Submission Draft - Florida Farm North & South Kathryn Duckworth

planningpolicy 24/02/2019 15:07

1 Attachment



Letter Opposing Planning Consent for Local Plan.doc

Please find my attached representation in relation to the above:

202 Liverpool Road ASHTON-IN-MAKERFIELD Wigan Lancs WN4 0YT

24th February 2019

St Helens Council Town Planning Town Hall Victoria Square ST HELENS Merseyside WA10 1HP

TO WHOM IT MAY CONCERN

Dear Sir/Madam

Re: St Helens Borough Local Plan: Submission Draft – Florida Farm North & South

I object to the Local Plan proposals in the above areas, for the following reasons:

- Loss of greenbelt/agricultural land all brownfield land should be
 cleaned up & utilised for new builds & it should be a mandatory
 requirement for local authorities to adhere to in order to protect our
 precious greenbelt land for future generations. If we continue our
 destruction of greenbelt land, all that our children/grandchildren will be
 left with is an abundance of urban brownfield land, creating eyesores &
 in some cases danger for children playing there, as no one will want
 the hassle & expense of cleaning them up.
- Loss of flora & fauna it's impossible not to kill a lot of wildlife & reduce their remaining habitat drastically if these proposals succeed. Do you not understand the damage this plan will do to the environment with the ensuing pollution that will occur? We are being told by experts that the way we live our lives at the moment is not sustainable & we are on a precipice concreting over green belt land should not be allowed, we need green spaces & trees to encourage wildlife.
- Bericote's current warehouse build is an eyesore that the council said would be hidden from view on Liverpool Road with raised banks & trees not so!, if they're planning to hide it with trees that is a very expensive option or are we having saplings that we take years to grow (which in itself it not what we were led to believe) or is it a case of





nothing will be done as you have got what you wanted so to hell with the residents.

- Risk of flooding at Springfield Park & Clipsley Brook again & possibly other areas as well if more land is covered in concrete.
- Proximity to existing residential areas, which could be stressful & result in a devaluation of these properties.
- Noise from vehicles arriving/departing from the proposed 24 hour site operation & the loud reverse warning noise they make.
- Light pollution has an effect on wildlife, our ecosystem & people who
 are unfortunate enough to live in close proximity to excessive artificial
 lighting.
- Road congestion the proximity of this area to M6 motorway, East Lancs Road & Haydock Industrial Estate has always meant that it is very heavily used & often leads to a congested network of roads. As local residents are fully aware, this whole area becomes grid-locked on a regular basis due to an accident occurring within this road network.
- Pollution from HGV diesel particulates & vehicles used by employees at the proposed development.
- The current levels of noise & vibration from HGVs already has an effect on residents' lives. The vehicles thunder up & down these roads, causing windows to rattle, manhole/grid covers become loose & noisy & having windows open means you can hear the noise inside your home.

Please do not allow the destruction of any more of our precious greenbelt land by allowing profit orientated developers to dictate how our community should be carved up. There are numerous empty units & brownfield sites across Merseyside & these should & must be the first priority for this development – 'HANDS OFF HAYDOCK GREENBELT – NO MORE DEVELOPMENTS ON FLORIDA FARM'

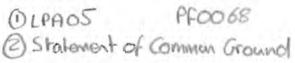
Yours sincerely

Kathryn Duckworth

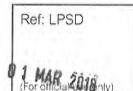


RO0487





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



Please also read the Representation Form Guidance Note that is available with this form, or online at:

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

www.sthelens.gov.uk/localplan

Part B - Your Representation(s)

PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

0 1 MAR 2019

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: JOHN	First name:
Last Name: DUCHWORTH	Last Name:
	Organisation/company:
Address: 2 Rushy Paru Cottages Islands Brow	Address:
	Postcode:
- VOICOGC	Tel No:
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Yes (via email)	Who By Post please
lease note - email is the Council's preferred method	d of communication. If no email address is provided,

RETURN DETAILS

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Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To w	hich pa	rt of the Local Pla	n does this repre	sentation relate?	
Policy PAOS Plondy Farm Fourh	<u>SITE</u> 24A	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		nts (please name relevant part/section	on)		
				Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally	Complia	ant?		Yes No	
Sound	>			Yes No	
Compli	es with t	he Duty to Cooper	ate 🔲 `	Yes No	
Please	tick as a	ppropriate		*	minister
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7	. Please set out what modification(s) you consider necessary to make the Local Plan legally
	compliant or sound, having regard to the matter you have identified at 6. above where this
	relates to soundness (NB please note that any non-compliance with the duty to cooperate is
	incapable of modification at examination). You will need to say why this modification will make
	the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your
	suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from greatest

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

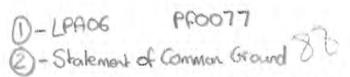
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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1. Your Details (we will correspond via your agent	2. Your Agent's Details (if applicable)
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Please be aware that anonymous for considered you MUST include your considered your formal than the second	ms cannot be accepted and that in order for your comments to be details above.
Vould you like to be kept updated	of future stages of the St Helens Borough Local Plan 2020-20353 xamination, publication of the Inspector's recommendations and
Yes (via email)	By post please
Please note - email is the Council's prove will contact you by your postal ad	preferred method of communication. If no email address is provided,

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and issues he/she identifies for examination. 8. If your representation is seeking a modification.	ly at the request of the Inspector, based on matters

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Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, publiadoption of the Plan)	s of the St Helens Borough Local Plan 2020-2035? ication of the Inspector's recommendations and
Yes (via email)	NO By Post please
Please note - email is the Council's preferred methowe will contact you by your postal address.	d of communication. If no email address is provided,

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Policy LIAO4 SITE 2EA 6EA Haydocular + Uvepon R	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	n)		
4. Do you consider the St Helens Please read the Guidance note f			e Tests of Soundness
Legally Compliant?		Yes 🔲 No	
Sound?		Yes No	
Complies with the Duty to Coopera	ate	Yes No	
Please tick as appropriate			
5. If you consider the Local Plan Please read the Guidance note f			
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Justified?		/	
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Consistent with National Policy?	V		
6. Please give details of why you or fails to comply with the duty If you wish to support the lega use this box to set out your co	y to cooperate. <u>P</u> I compliance or s	lease be as precise as po	essible.
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Title: M/ John	Title:
	First name;
	Last Name:
Organisation/company:	Organisation/company:
Islands Brow	Address:
-	Postcode:
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	Mobile No:
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Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	
Yes (via email)	No By lost Please
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PAOS B	Paragraph/ diagram table		Policies	Sustainability	Distances
	table table		Мар	Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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4. Do you Please	u consider the St H	elens Bo	rough Local I	Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

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RO0488

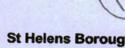




1 3 MAR 2019

Ref: LPSD

(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

(1)-LPAOS

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)		
Title: MRS	Title:		
First Name: DEBORAH	First name:		
Last Name: DUFFY	Last Name:		
Organisation/company: NA	Organisation/company:		
Address: 180 Two Butt have RAINHILL, PRESCOT MERSEYSIDE Postcode: L35 8PT	Address: Postcode: Tel No:		
	Mobile No:		
	Email:		
Signature:	Date: /19/3/19///		

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Inspector's recommendations and	ted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the dadoption of the Plan)
Yes 🗶 (Via Email)	No 🗌
Please note - e-mail is the Counci address is provided, we will conta	il's preferred method of communication. If no e-mail oct you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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MRS Deborah Duffy, 180 Two Butt Lane, Rainhill, L358PT

Policy - LPAOG

Paragraph - 345

9/3/19

(1)

contd.

This would therefore suggest that the Council MANOT to build 1500 more houses than the OWS suggests that the St. Helens area NEEDS

- We have been informed that the present of Helens Council Brown field Register could accommodate developments for approximately 5,800 new houses. We would therefore suggest that if the Brown field siles were developed then the ONS figure of 5745 houses could be easily accommodated without destroying the Green Belt Land.
- We have been advised that only 57 hectures of additional Green Belt Land and NOT the 288 hectures proposed by the Council (table 4.5), would be more than adequate for the building of these additional 1500 houses, but may we emphasise again these are houses that the OWS figures suggest that the Borough of St Helens does NOOT NEED
- Since the mid 1980's there has been a stready declare in industry in the St Helens area and therefore the area of 3H5 (Eccleston Park Golf Club EPGC) relies predominantly upon employment outside of this area to provide income based salaries to
- purchase the higher-priced property.

 The area of 3HS (EPGC) is situated between 3 railway stations but there is NO parking at Eccleston Park Station and only limited parking at Prescot and Rainhill Stations where the parking facilities are fully whilised before 8 am now. Commuters cars fill the surrounding roads, creating congestion and discruntled residents.
- The infrastructure around the area of 3MS (EPGC) is serviced by 2'B' roads (Rainhill Road and Portico Lane) and 1'C' road (Two Butt Lane). In our experience these roads presently are unable to support the current levels of traffic, especially at peak times school dropost / collection, Whiston Hospital

this Deborah Duffy, 180 two Butt Lane, Rainhill, L358PT Policy-LPAO6 Paragraph-3HS 9/3/1

visiting times, residents making their way to work directly or trying to access the Motorways (MEZ, M57) or the local train stations, to commute to work.

Many of us have experienced an increase in our travel times due to the increase in traffic on our local roads and the roads surrounding us (348) including the only single carriage 'A' road (warrington Road) in the area.

- St Melens Council made the decision in December 2018 to trabe 3HS (EPGC) out of Green Belt status and place it in Safeguarding status but Mulberry Warrington Add have purchased the land and their plan is to develop 900+ houses on the site, without the infrastructure to support dary development.

In our experience the local road retwork (many of the jimchions in the area around Raenhill are already at capacity and that's according to Council figures), the local Hospital wicheding the At & facility, the local Primary and Secondary Schools, GP surgeries, Dental surgeries are all full to capacity so any additional housing in this area (3Hs) is NOT sustainable, therefore encouraging plential new residents to use their vehicles to access these services out of the area, resulting in further traffic cargestion and the smaller B' and 'C' roads that service the estates of launhill being whised as 'rat runs'. The residents of Rainhill are already experiencing this problem causing pedestrian danger especially outside our Primary schools (Longton Lane, St Anne's, Eccleston Lane Ends)

This increase in braffic congestion will increase traffic pollution and therefore will affect pedostrian safety (troffic presently has to bump up onto pavements to enable Emergency behicles to pass) and also increase air pollution in an

· Mrs Delcarch Duffy, 150 Two Butt Lane, Rounkill, 435 8PT.
Policy-LPA06 Paragraph-3H9 9/3/18
could.,

area when under 75's deaths in St Helens from Respiratory Diseases is way above the national average - figures for 2013-2015 show an average of 51-9 deaths per 100,000 population in St Helens, compared to 44.3 for the North Loest and 33.1 for the rest of England.

- We understand that 3HS (EPGC) is confirmed Zone Two and Zone Three flood plain with a very high water-table (in fact the local Fire Brigade can draw water directly from it, in an Emergency). Galfers who have played on 3HS (EPGC) have experienced tunies when the course was too waster-logged to be played on.

To lose this flood zone by building 900+ homes on it would dramatically offect the ability of the land around it to drain, placing property along the existing brook at risk to flooding.

In our experience those who presently live on two Butt have opposite 3HS experience poor drainage around our houses and gardens now, due to the land our houses are built on and the underground stream system. To lose the food zone due to houses being built on BHS would undoubtedly compromise our properties.

In addition to this United Unlibes have expressed that on occasions of heavy rainfall, the water table has been contaminated.

The Statustory Covernment Consultant Body, Sport England, objected to the closure of the area 3HS (EPGC)-the golf course, at stage I of the local plan. This objection has yet to be answered by St Helens Council — any objection from a Statustory Consultee Must be resolved or upheld!—St Helens Council howe failed to provide compelling evidence that there is an over-subscription of golf, within the local area.

Hirs Deborah Duffry, 180 Two Butt Loune, Rambill L358PT

Policy - LPA 06

Paragraph - 3HS

9/3/18

Cando.,

- Rainhill Parish Council have also objected to the St Melens Local Plan and has opposed planning applications for new development on orean Bert Land (3HS) - see attached letter please.
- The official Government and Guncil policy states that Green Belt land should only be released in exeptional circumstances. To take 3HS (EPGC) out of Green Belt status and place it into safeguarding with the potential for subsequent housing development by rulberry warrington htd., would create a continuous area of orban development by released and result in the loss of around 59 species of flora and fauna, including more than 13 species that are protected!

With Green Belt status 3HS (EPGC) would continue to act as a natural green space buffer separating the areas of whisten, Portico, Eccleston Park, Noutgrove, Thatto Heath and Rainhill.

The conclusion we strongly feel that the release of Green Belt Land like 345 (CPGC) would cause significant harm to the residents, infrastructure and health of future generations in Rainhill and in addition would cause significant harm to the whole purpose of GREENS BELT LAND.

The above comments have been compiled by the residents of Rainhill and of the local surrounding areas who live, work travel through, use the local amenities — those people who regularly use the present infrastructure that is failurg us now.

With thats

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Council in St. Helens should delete this land (3MS) from the proposed removal from the Green Belt - Herefore abiding with the Nahanal Planning Policy Framework (2019)

St Helens Council should <u>NOT</u> consider removing this land from Green Belt to place it in Safegrarded

Please

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



Clerk to the Councit: Gillian Pinder 12 Toftwood Gardens, Rainhill Prescot, L35 0QX



St. Helens St. Helens Council Town Hall Planning Policy Team

28th January 2017

Local Plan Preferred Options Report - Comments

The following comments are made in response to consultation on the St. Helens Local Plan Preferred Option Report on behalf of Rainhill Parish Council.

assign even more land for development into a 15 year local plan. This runs counter to the concept of localism. We also note that a failure by St Helens Council to introduce sufficient development land into the plan is very likely to result in indiscriminate development on green land The Parish Council deplores this Government's changed policy that requires all local councils to

The Parish Council wishes to place on record that it shares residents' concerns that the proposal

- Lead to additional traffic congestion on roads that are already nearing their safe capacity, a problem that will be intensified should the High School expand;
- Have a detrimental effect on highway safety, for vehicles and pedestrians alike;
- iii. Increase the pressure on schools and nurseries, which are already over-subscribed:
- Increase the pressure on social infrastructure e.g. Doctor's surgeries, dentists;
- Be detrimental to residential amenity, due to the loss of Green Belt Exacerbate existing health problems for residents, due to increase vehicle pollution; and
- add pressure to existing infrastructure and services, once it starts to be developed, and we are on record as expressing our concerns on several occasions and asking St Helens Council to prepare for the consequences of Knowsley Borough's action. The Parish Council believes that the proposed Halsnead Village development in Knowsley will

Yours faithfully

Clerk to Rainhill Parish Council Gillian Pinder



Serving the Rainhill Community since 1894

Rainhill Parish Council

Clerk to the Council: Gillian Pinder 12 Toftwood Gardens, Rainhill Prescot, L35 0QX



Newgate North Account Manager

20th February 2018

Eccleston Park Golf Course - Mulbury Homes

Course, which, as its name implies, actually lies in Eccleston Parish. Thank you for inviting Rainhill Parish Council to discuss the future of Eccleston Park Goff

Rainhill Parish Council has always opposed planning applications for new development on Green Belt land. Its longstanding policy is to prioritise the reuse of previously developed land in sustainable locations, before greenfield or Green Belt sites.

would be premature because the future of the site is currently unclear. version of the Local Plan is expected later this year, it is considered that a meeting at this stage compromised by actions which could be perceived as predetermination. As the submission The Council also has a longstanding policy to ensure its ability to represent its residents is not

is tempered by any unresolved objections. The Council cannot therefore, at the present time Plan is released for consultation. The NPPF is clear that the weight afforded to emerging plans of objections, the outcome of which will only be known when the submission version of the Loca strategic housing development site, consultation on this document raised a substantial number allow the Preferred Options allocation to influence its judgement. Although the site has been identified in the St. Helens Local Plan Preferred Options as a

Eccleston Park Golf Club, namely the development would: were raised by residents and the Parish Council in relation to potential development of During consultation on the Preferred Options version of the Local Plan, the following concerns

- Lead to additional traffic congestion on roads that are already nearing their safe capacity, a problem that will be intensified should the High School expand;
- Have a detrimental effect on highway safety, for vehicles and pedestrians alike Increase the pressure on schools and nurseries, which are already over-subscribed:
- Increase the pressure on social infrastructure e.g. Doctor's surgeries, dentists.
- Exacerbate existing health problems for residents, due to increase vehicle pollution; and
- Be detrimental to residential amenity, due to the loss of Green Belt

Parish Council will be interested to see how these concerns would be addressed Should the designation ultimately change and a proposal for development be forthcoming the

if you would like clarification on any point please do not hesitate to contact me

Yours sincerely.

Clerk to Rainhill Parish Council Gillian Pinder



Serving the Rainhill Community since 1894

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3. NAME SARAH	PRINT NAME SATCHELL
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4. NAME MRS LYNDA LAWTON	PRINT NAME LYN LAWTON
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WE HAVE ALL WOORKED ON THIS RESPONSE

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Amy Gaskeli		9.	3.2019
Jon Grevey		9.	3.2019
LESLEY ASH		9-	3.2014
CLAIRE ASH.			1.3.19
Walter Ash			7.3.19
JAN MOLLOS		12	3.19
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Print Name	Address	Signature	Date
marie leish			8/3/19
GREG OMARA			1/3/19
Emma Evans			9/3/19
SHEIVA LAFFES			9/3/19.
JOHN LARREY			9/8/19
GEORGE LONG LORGE			9.3.19
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lessely			8.3.19
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Sandre			8.3.19
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Cannel			8.3.19
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Cath Haynul			8-3.19
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IAN			7/3/2019.
HILZOCK			
LYNSET PATTEN			813119.
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ROBERT BOYLE			8/3/19
Mary Baxter			8/3/19.
SHELLA BENTLEY			813119
Laura Foster			8/3/19
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3	NAME DEL J. A. Hauling PRINT NAME DENNIFER HAWKINS
	ADDRESS
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4	NAME SHERIDAN WEBB PRINT NAME SHERIDAN WEBB
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1. NAME ML-R-LAWTON. PRINT NAME RON LAWTON	
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2 NAME MRS N BASNET PRINT NAME NICOLA BASNETT	
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3. NAME MR W DEVLING PRINT NAME W DEVLING	
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Rosheen			713/19
Simpson			
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BARRY			7/3/19
HEARS			115110
RON			
Cock short			
			07/03/19
SARA			
RIDGLAY			7.3.19
PAT			
COCKSHOTT			7-8-19
COCKZHOLL			
Rachel willock.			428
			7.3.19.
WE HAVE	E ALL WORKED	ON THIS RESPONSE	

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Print Name	Address	Signature	T Date
Paula DAINTY			07:03:2019:
Emma McDermott			7.3.19.
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WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE ATTACHED TO: Deborah Dufe

Print Name	Address	Signature	Date
G-M-FARLANE			8/3/19
Mie Gringg			8/3/19.
L. Jones			8 (3 /19.
Joyce menamara			8/3/19.
JANET RAINE			8/3/15.
LAMEA WHITE			8/3/19.
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WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE ATTACHED TO: Deloval Duff

Print Name	Address	Signature	Date
LESLEY			9-3-19
BRIDGE			
ALAN BRIDGE			
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BILL CRELLIN.			
			9/3/14
D. Emark.			9/3/19
L.R. EVHONS			9/3/19
M. Garvey			913/19

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1. NAME Rebecca Dinnell	- Delavar Duff
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2. NAME CHAN'S Really	RINT NAME
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3. NAME Margalet Challoner	THENAME
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4. NAMECANA Prescott	
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1. NAME MARIE CLARRY PRIN	
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2. NAME AMY HOMMOND PRIN	
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3. NAME PAULINE M' Gom' POR	
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1. NAME Jonet (AMONON)	
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Print Name	Address	Signature	Date
Alicia			11/03/2019
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PETER HEAD			11/3/19
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Print Name_	Address	Signature	Date
LINDA SHEA			12.3.19.
Jone Crank			12/03/19
TAUL DEAN			12/3/19
JOANNE DARWIN			12/3/19.
LINDA CARROLL			12/3/19.
Adelle Huth			12/3/15
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Mollie Dixon			12/8/19	
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Adele			12/3/19.	
Grawford				
Josie Ormrod.			213119	
Kim o'calign			12/3/10	
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Sonia Sheils			12.3.19	
Liz Jorle			12/3/19	
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a 11 Eallach			12/03/19
Deryll Follett			
Amarda Clark			12/3/19
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Matthew Collie			
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MALGARET MILLS			11.03.19
Renwell			11/3/19.
Ross WUKINSON			11/3/19,
WE HAVE	ALL WORKED	ON THIS RESPONSE	

RO0489

- Green Best Review 2018 744

1 3 MAR 2019



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MR	Title:
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Signature:	Date: 25.02.2019
Please be aware that anonymous forms cannot be considered you MUST include your details above.	e accepted and that in order for your comments to be
	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred me we will contact you by your postal address.	thod of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

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indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Shaun Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are in frequently gridlocked, often putting extra unpaid hours on the working week.

The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

The Council has already granted acutely contentious planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

The visual impact from Liverpool Road/Garswood Road will be severe if this Greenbelt is removed to accommodate yet more warehousing would be an unnecessary additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in future years.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, hormonal & cardiovascular effects, hypertension, poorer work and school performance, hearing impairment, etc. Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often. Release of this Greenbelt for further unnecessary warehouse development is highly likely to create noise over and above WHO guidelines. This is a problem that will be further exacerbated in the evening and early hours i.e. noise and disturbance from vehicles entering and leaving site 24 hours a day and noise from reversing warnings on vehicles throughout the night. Traffic noise on the A58 Liverpool Road is already a big issue the light of the junction with the East Lancashire Road.

It is also worth noting the substandard and dangerous access via Calday Grove/Liverpool Road junction. Visibility for drivers is approximately half of that recommended as a minimum in local and national planning guidance (St Helens MBC's "Highways for Adoption – A Planning Guide" and "Places, Streets and Movement" DETR). Residents also face significant time delays and restrictions of access when leaving the site at peak times.

St Helens is already the second noisiest part of the North West according to data gathered by noise monitoring researchers Cirrus.

There's appears to be a Council perception of an overriding need for logistics in Haydock to serve St Helens and the wider city region, but St Helens Metropolitan Borough Council Draft SA/SEA Scoping Report December 2015 provides us with the following statistical information: Employment and economic activity in the borough - 4.80 Transport storage (logistics) is a major strength for St Helens, representing the highest proportion of employees in the whole of the North West (8.7%) of the workforce - 5,200 employees), almost double the national average.

Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Should this Greenbelt be released for warehouse development there will be a substantial increase in the use of HGV's and other road vehicles. Road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." *Professor Barbara Maher 05/09/2016*

Haydock does not need so many warehouses, the growth in the borough does not justify the extra warehouse building. There is no special circumstances that warrant Greenbelt release. The only benefit for releasing Greenbelt for development lies with the developer (maximise profit) and the council (income generated from business rates). It is a Local Plan that appears to be driven by developer's requests and not by local need. There is no benefit to residents. Just more misery.

The points raised throughout the Greenbelt Review (2018) clearly show inconsistencies with very subjective scorings and findings. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounted from the scoring, findings and rationale documented to produce the desired results.

The local plan is quite simply based on flawed employment forecasts and cannot be supported by historical facts.

1 3 MAR 2019



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
	Last Name:
Organisation/company:	Organisation/company:
HAYDOCK ST. HELENS	Address:
	Postcode:
	Tel No:
Signature:	Date: 25.02.2019
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Vould you like to be kept updated of future stag namely submission of the Plan for examination, pu doption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? ablication of the Inspector's recommendations and
Yes (via email)	□ No

Please note - email is the Council's preferred method of communication. If no email address is provided,

RETURN DETAILS

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Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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Policy	104	Paragraph/	Policies	Sustainability	Hobiteta
Folicy	LPAOS SITE 2HA	Paragraph/ diagram table	Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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Sound?				Yes 🔽 No	
Complies with the Duty to Cooperate			ate .	Yes 🔽 No	
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✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

1800756M

Shaun Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA05 Site: 2HA

Continued from part B box 6

Extra housing in this area isn't sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Doctor's surgeries and schools are full to capacity (nowhere to build new schools) and roads are trequently gridlocked, often putting extra unpaid hours on the working week.

Should this land be released from the Greenbelt, the proposed access to the site is wholly inadequate; a left in/left out from the East Lancashire Road will threaten highway safety and the proposal for a junction at Liverpool Road & Vicarage Road would increase traffic volume to unmanageable levels on an already congested, over-stretched highways system.

The proposal to remove this land from the Greenbelt for development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed contentious warehouse development on Florida Farm North (opposite the greenbelt site set aside for 522 houses), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

Another consequence of releasing this greenbelt for development could be flooding. Has the drainage capacity been adequately assessed and has the Environment agency passed comment as their report would be key? What is the predicted impact on water flow rates and water quality? There are existing flooding problems at this site and any remedies to prevent this would place even greater amounts of water into Clipsley Brook. The proposed development will also surely have a detrimental impact upon the wildlife value of Clipsley Brook, streams, water voles and bluebell woodland etc. The brook would be underground and completely lost forever – the long term effects will be the complete destruction of a natural environment.

There is no statement of common ground with neighbouring authorities.

It is my understanding that the number of existing empty properties together with land that has also acquired planning permission for housing already exceeds the number of houses required for the council to meet their quota. There is no need to release this land from the Greenbelt.

St Helens does not need so many houses, the growth in the borough does not justify the extra house building. There is no special circumstances that warrant Greenbelt release. The only benefit for releasing Greenbelt for development lies with the developer (maximise profit) and the council (income generated from Council Tax). It is a Local Plan that appears to be driven by developer's requests and not by local need. There is no benefit to residents. Just more misery.

The points raised throughout the Greenbelt Review (2018) clearly show inconsistencies with very subjective scorings and findings. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounted from the scoring, findings and rationale documented to produce the desired results.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and the borough's employers pay 15 per cent below the national average for salaries. A point brazenly publicised by previous developers. It is also widely accepted that Haydock and the roads into the area are often gridlocked, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. There is no incentive for people to move to the area and there doesn't appear to be the financial capability to obtain mortgages for new properties. Has the Council factored any of this information into their assessment?

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Due to the undeniable increase in the use of HGV's whilst building the houses and private car useage that is highly likely to be generated by this unnecessary residential development, road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

The proximity of cycle paths (cyclists, joggers and walkers are all at risk) should be incorporated into all independent air pollution investigations and all independent air pollution investigations should be conducted during peak times and not in school holidays.

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

The local plan is quite simply based on flawed employment forecasts and cannot be supported by historical facts.



RO0490

1 3 MAR 2019





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
Last Name: NOSEN	Last Name:
	Organisation/company:
Address: 440 Liver Acol, Road	Address:
Postcode: WALL GRO	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 1) 2, 19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	☐ No
	hod of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council Town Hall Victoria Square St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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Sound?	Policy	LPAOS SITES 2HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness Legally Compliant? Yes No Out END No Complies with the Duty to Cooperate Yes No Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy? Description of the Tests of Soundness Description of the Tests of No.				on)		
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Matthew Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA05 Site: 2HA

Continued from part B box 6

Extra housing in this area isn't sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Doctor's surgeries and schools are full to capacity and roads are in constant gridlock, often putting unpaid extra hours on the working week.

The proposed access to the site is wholly inadequate; a left in/left out from the East Lancashire Road will threaten highway safety and the proposal for a junction at Liverpool Road & Vicarage Road would increase traffic volume to unprecedented levels on an already congested, over-stretched highways system.

This proposal does not include the 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated once the new development is in full operation. Using the developer's own figures that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. And this is highly likely to be an underestimate. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

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1 3 MAR 2019





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	Title:
	First name:
Last Name: \(\lambda \lambda \	Last Name:
	Organisation/company:
Address: 440 Liverpool Roa Haydode	Address:
Postcode: WALL GDD	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 12.3.19
Please be aware that anonymous forms cannot considered you MUST include your details abo	be accepted and that in order for your comments to be ve.
Would you like to be kept updated of future and common submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
✓ Yes (via email)	□ No
Please note - email is the Council's preferred r	method of communication. If no email address is provided,

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Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

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		ts (please name elevant part/section	on)		
				Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally	Complia	nt?		Yes □ No Ob	n't know
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440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

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The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

The Council has already granted acutely contentious planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

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Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

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If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." Professor Barbara Maher 05/09/2016

RO0491



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MRS	Title:
First Name: DOROTHY JEAN	First name:
Last Name: DUES	Last Name:
Organisation/company:	Organisation/company:
	Address:
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Yes (via email)	☐ No
Please note - email is the Council's preferred we will contact you by your postal address.	method of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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Please use a separate copy of Part B for each separate comment/representation.

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Policy	I DA	Paragraph/	Policies	Sustainability	Habitats
. 59)	LPAOY SITES 2EA 5EA 6EA	diagram table	Map	Appraisal/ Strategic Environmental Assessment	Regulations Assessment
		ts (please name relevant part/section	on)		
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Dorothy Jean Duffy

47 Wrigley Road, Haydock, St Helens, WA11 0NN

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

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If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

Haydock does not need so many warehouses, the growth in the borough does not justify the extra warehouse building. There is no special circumstances that warrant Greenbelt release. The only benefit for releasing Greenbelt for development lies with the developer (maximise profit) and the council (income generated from business rates). It is a Local Plan that appears to be driven by developer's requests and not by local need. There is no benefit to residents. Just more misery.

The points raised throughout the Greenbelt Review (2018) clearly show inconsistencies with very subjective scorings and findings. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounted from the scoring, findings and rationale documented to produce the desired results.

The local plan is quite simply based on flawed employment forecasts and cannot be supported by historical facts.

PF0687



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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Title: MRS	Title:
First Name: DOROTHY JEAN	First name:
Last Name: Ouce	Last Name:
Organisation/company:	Organisation/company:
HAYDOCK STHELENS	Address:
Postcode: WAII ONN 1	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 13 3 2019.
Please be aware that anonymous forms canno considered you MUST include your details ab	ot be accepted and that in order for your comments to be pove.
Would you like to be kept updated of future (namely submission of the Plan for examination adoption of the Plan)	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
✓ Yes (via email)	☐ No
Please note - email is the Council's preferred we will contact you by your postal address.	method of communication. If no email address is provided,

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	LPAOY SITES 2EA 5EA 6EA	Paragraph/ diagram table	Map	Sustainability Appraisal/ Strategic Environmental Assessment	Regulations Assessment
		ts (please name elevant part/secti	on)		
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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47 Wrigley Road, Haydock, St Helens, WA11 ONN

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Continued from part B box 6

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Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

RO0492





St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Please note - email is the Council's preferred met	hod of communication. If no email address is provided,

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Local Plan

St. Helens Council

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Victoria Square

St Helens

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diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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7.	Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
1	Delete this land from the proposed removal from Greenbelt.

Please continue on a separate sheet if necessary

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Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Julie Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA05 Site: 2HA

Continued from part B box 6

Extra housing in this area isn't sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Doctor's surgeries and schools are full to capacity and roads are in constant gridlock, often putting unpaid extra hours on the working week.

The proposed access to the site is wholly inadequate; a left in/left out from the East Lancashire Road will threaten highway safety and the proposal for a junction at Liverpool Road & Vicarage Road would increase traffic volume to unprecedented levels on an already congested, over-stretched highways system.

This proposal does not include the 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated once the new development is in full operation. Using the developer's own figures that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. And this is highly likely to be an underestimate. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

Another consequence of this development could be flooding. Has the drainage capacity been adequately assessed and has the Environment agency passed comment as their report would be key? What is the predicted impact on water flow rates and water quality? There are existing flooding problems at this site and any remedies to prevent this would place even greater amounts of water into Clipsley Brook. The proposed development will also surely have a detrimental impact upon the wildlife value of Clipsley Brook, streams, water voles and bluebell woodland etc. The brook would be underground and completely lost forever — the long term effects will be the complete destruction of a natural environment.

There is no statement of common ground with neighbouring authorities.

It is my understanding that the number of existing empty properties together with land that has also acquired planning permission for housing already exceeds the number of houses required for the council to meet their quota.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and the borough's employers pay 15 per cent below the national average for salaries. A point brazenly publicised by developers. It is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. There is no incentive for people to

move to the area and there doesn't appear to be the financial capability to obtain mortgages for new properties. Has the Council factored any of this information into their assessment?

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Due to the undeniably vast increase in the use of HGV's whilst building and private cars that is highly likely to be generated by this unecessary residential development, road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

The proximity of cycle paths (cyclists, joggers and walkers are all at risk) should be incorporated into all independent air pollution investigations and all independent air pollution investigations should be conducted during peak times and not in school holidays.

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

Planning Failure - "Air pollution is the grossest manifestation of a failure of UK transport planning to take the environmental impacts of transport choices sufficiently into account."

"Air pollution-related morbidity and mortality are at epidemic levels - and, although less obvious, are more significant than road transport collisions as a cause of death and injury.

"There needs to be a strong political and societal commitment to protecting public health, particularly the health of children, whose life chances can be seriously compromised by exposure to air pollution."

"Currently, air pollution is a shared priority between Defra and the Department for Transport, but shared priority does not mean equal priority. Transport policy and planning has instead prioritised safety and economic growth."

That pollution is estimated to shorten the lives of more than 50,000 people a year.

This is far higher than the number of deaths caused by traffic accidents (1,713 in 2013) - yet road safety is a much higher priority for planners than pollution, the researchers say.

Dr Tim Chatterton and Professor Graham Parkhurst - 30 August 2016

The estimate for the UK is that 50,000 people die every year with conditions linked to polluted air and earlier this year the World Health Organisation warned that air pollution was leading to as many as three million premature deaths every year.

Air pollution was linked to a significant increase in the risk of Alzheimer's disease by a major study published in 2015, while other research showed brain damage related to Alzheimer's disease in children and young adults exposed to air pollution. Air pollution has also been linked to dementia in older men and women.

Air pollution is a global health crisis that kills more people than malaria and HIV/Aids combined and it has long been linked to lung and heart disease and strokes. But research is uncovering new impacts on health, including degenerative brain diseases such as Alzheimer's, mental illness and reduced intelligence.

Toxic nanoparticles from air pollution have been discovered in human brains in "abundant" quantities, a newly published study reveals.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." Professor Barbara Maher 05/09/2016



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Title: Mus	Title;
	First name:
	Last Name:
	Organisation/company:
Pentall Haydock	Address:
Postcode: WAII 9RP	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 12 · C 3 · 19
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Nould you like to be kept updated of future stage namely submission of the Plan for examination, pube adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? olication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred methore will contact you by your postal address.	od of communication. If no email address is provided,

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3. To w	hich part of the Local Pla	an does this repres	entation relate?	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Policy	LPA04 Paragraph/ SITES diagram table 5EA 6GA	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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Julie Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are in constant gridlock, often putting unpaid extra hours on the working week.

Additional warehouse development will vastly increase traffic volume to unprecedented levels on an already congested, over-stretched highways system that still has to account for an additional (under) estimated 6700 vehicle movements a day, generated by the opening of the newly built inappropriate warehouse development adjacent to the proposed removal of Greenbelt for warehouse development.

The Council has already granted planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

This proposal does not include the 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated once the new development is in full operation. Using the developer's own figures that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. And this is highly likely to be an underestimate. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such significant additional development is highly likely to generate.

The visual impact from Liverpool Road/Garswood Road will be severe. Current protected countryside views to be replaced by sizeable warehousing and will take many years for proposed landscaping works to shield. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in the future.

The development would be an additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest

(5)

impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

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"There needs to be a strong political and societal commitment to protecting public health, particularly the health of children, whose life chances can be seriously compromised by exposure to air pollution."

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This is far higher than the number of deaths caused by traffic accidents (1,713 in 2013) - yet road safety is a much higher priority for planners than pollution, the researchers say.

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"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." *Professor Barbara Maher 05/09/2016*

RO0493

1 3 MAR 2019

Ref: LPSD

PF0690





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Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stag (namely submission of the Plan for examination, pu adoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred method we will contact you by your postal address.	od of communication. If no email address is provided,

RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

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planningpolicy@sthelens.gov.uk

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PART B - YOUR REPRESENTATION

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COLUMN TO SERVICE SERV		t of the Local Pla	iii does tilis repre	sentation relate	<u> </u>	
Policy	LPAOY Sites ZEA SEA GEA	Paragraph/ diagram table	Policies Map	Sustainabi Appraisal/ Strategic Environme Assessme	ntal	Habitats Regulations Assessment
		is (please name elevant part/section	on)			
		der the St Helens ne Guidance note				ests of Soundness
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Compli	es with th	e Duty to Coopera	ate 🔲	Yes 🔽] No	
Please	tick as ap	propriate				
Justified Effective	e?	ed? National Policy?				
or fai	ls to con wish to	etails of why you aply with the duty support the legal o set out your co	to cooperate. <u>Pl</u> compliance or s	ease be as prec	ise as possi	Complete College
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ormation necessary to support/justify the representation of normally be a subsequent opportunity to make for essentation at the publication stage. Iter this stage, further submissions will be only at the dissues he/she identifies for examination. If your representation is seeking a modification; the oral part of the examination? (the hearings in	ly all the information, evidence and supporting ion and suggested modification, as there urther representations based on the original the request of the Inspector, based on matter
	ly all the information, evidence and supporting ion and suggested modification, as there urther representations based on the original the request of the Inspector, based on matter
	public)
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of the ex this to be necessary:	xamination, please outline why you consider

indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Callum Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are frequently gridlocked, often putting extra unpaid hours on the working week.

The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

The Council has already granted acutely contentious planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

The visual impact from Liverpool Road/Garswood Road will be severe if this Greenbelt is removed to accommodate yet more warehousing would be an unnecessary additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in future years.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, hormonal & cardiovascular effects, hypertension, poorer work and school performance, hearing impairment, etc. Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often. Release of this Greenbelt for further unnecessary warehouse development is highly likely to create noise over and above WHO guidelines. This is a problem that will be further exacerbated in the evening and early hours i.e. noise and disturbance from vehicles entering and leaving site 24 hours a day and noise from reversing warnings on vehicles throughout the night. Traffic noise on the A58 Liverpool Road is already a big issue the light of the punction with the East Lancashire Road.

It is also worth noting the substandard and dangerous access via Calday Grove/Liverpool Road junction. Visibility for drivers is approximately half of that recommended as a minimum in local and national planning guidance (St Helens MBC's "Highways for Adoption – A Planning Guide" and "Places, Streets and Movement" DETR). Residents also face significant time delays and restrictions of access when leaving the site at peak times.

St Helens is already the second noisiest part of the North West according to data gathered by noise monitoring researchers Cirrus.

There's appears to be a Council perception of an overriding need for logistics in Haydock to serve St Helens and the wider city region, but St Helens Metropolitan Borough Council Draft SA/SEA Scoping Report December 2015 provides us with the following statistical information: Employment and economic activity in the borough - 4.80 Transport storage (logistics) is a major strength for St Helens, representing the highest proportion of employees in the whole of the North West (8.7%) of the workforce - 5,200 employees), almost double the national average.

Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Should this Greenbelt be released for warehouse development there will be a substantial increase in the use of HGV's and other road vehicles. Road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." *Professor Barbara Maher 05/09/2016*



()-LPAOS (2)- Statement of Common Ground

1 3 MAR 2019

Ref: LPSD

PF0691



Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

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www.sthelens.gov.uk/localplan

Part B - Your Representation(s)

PART A - YOUR DETAILS

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
- [1] 하나 사이에 얼마나 먹는 사이가 하나면 하나	Title:
	First name:
	Last Name:
	Organisation/company:
	Address:
Haydock, Peniful St. Helens	
Postcode: WAIIARP	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25/02/19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	e accepted and that in order for your comments to be
	iges of the St Helens Borough Local Plan 2020-2035? bublication of the Inspector's recommendations and
✓ Yes (via email)	☐ No
Please note - email is the Council's preferred met we will contact you by your postal address.	thod of communication. If no email address is provided,

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To w	hich par	t of the Local Pla	an does this repre	sentation relate?	
Policy	LPAOS Site 2HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		s (please name elevant part/secti	on)		
				Plan 2020-2035 is: Legal Compliance and	d the Tests of Soundness
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Sound	?			Yes 💟 No	
Compli	es with th	e Duty to Cooper	rate 🔲	Yes 🔽 No	
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		Please continue on a separate sheet if necessary
3. If yo	ues he/she identifies for examination. our representation is seeking a modification or all part of the examination? (the heari	ation; do you consider it necessary to participate a ings in public)
	No, I do not wish to participate	Yes, I wish to participate at the oral examination
/	at the oral examination	
	AND	the examination, please outline why you consider
	ou wish to participate at the oral part of	

indicated that they wish to participate at the oral part of the examination

Please keep a copy for future reference.

Thank you for taking the time to complete and return this response form.

1800756M

Callum Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA05 Site: 2HA

Continued from part B box 6

Extra housing in this area isn't sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Doctor's surgeries and schools are full to capacity and roads are in frequently gridlocked, often putting extra unpaid hours on the working week.

Should this land be released from the Greenbelt, the proposed access to the site is wholly inadequate; a left in/left out from the East Lancashire Road will threaten highway safety and the proposal for a junction at Liverpool Road & Vicarage Road would increase traffic volume to unmanageable levels on an already congested, over-stretched highways system.

The proposal to remove this land from the Greenbelt for development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed contentious warehouse development on Florida Farm North (opposite the greenbelt site set aside for 522 houses), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

Another consequence of releasing this greenbelt for development could be flooding. Has the drainage capacity been adequately assessed and has the Environment agency passed comment as their report would be key? What is the predicted impact on water flow rates and water quality? There are existing flooding problems at this site and any remedies to prevent this would place even greater amounts of water into Clipsley Brook. The proposed development will also surely have a detrimental impact upon the wildlife value of Clipsley Brook, streams, water voles and bluebell woodland etc. The brook would be underground and completely lost forever – the long term effects will be the complete destruction of a natural environment.

There is no statement of common ground with neighbouring authorities.

It is my understanding that the number of existing empty properties together with land that has also acquired planning permission for housing already exceeds the number of houses required for the council to meet their quota. There is no need to release this land from the Greenbelt.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and the borough's employers pay 15 per cent below the national average for salaries. A point brazenly publicised by previous developers. It is also widely accepted that Haydock and the roads into the area are often gridlocked, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. There is no incentive for people to move to the area and there doesn't appear to be the financial capability to obtain mortgages for new properties. Has the Council factored any of this information into their assessment?

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Due to the undeniable increase in the use of HGV's whilst building the houses and private car useage that is highly likely to be generated by this unnecessary residential development, road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

The proximity of cycle paths (cyclists, joggers and walkers are all at risk) should be incorporated into all independent air pollution investigations and all independent air pollution investigations should be conducted during peak times and not in school holidays.

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

RO0494



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

1 3 MAY 2019

Please note that you must complete Parts A and B of this form

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: PETER DUFFY	First name:
_ast Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 122 Gartons Lane	Address:
Postcode: WA9 482	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 26. 2. 10

Would you like to be kept updated of future stages of the St Helens Borough Local					
Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)					
Yes (Via Email)					
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.					
address is provided, we will contact you by y	our postar address.				

RO0495



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1 3 MAR 2019

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: M.C.	Tu
First New Property	Title:
First Name: 1411211	First name:
Last Name: ADDM DELL	Last Name:
Organisation/company:	Organisation/company:
Address: 18 CALDER DRIVE	Address:
	Postcode:
	el No:
	Nobile No:
	Email:
Signature	Date: 124 Morch 2019
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Vould you like to be kept updated of future stage namely submission of the Plan for examination, public doption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? dication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred methode will contact you by your postal address.	od of communication. If no email address is provided,

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Local Plan St.Helens Council Town Hall Victoria Square St Helens

WA10 1HP

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

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3. To which	part of the Local Pla	an does this repre	sentation relate?	
Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other docu document a	ments (please name and relevant part/section	on)		
4. Do you o	consider the St Helen and the Guidance note	s Borough Local I for explanations of	Plan 2020-2035 is: Legal Compliance and t	he Tests of Soundness
Legally Cor	npliant?		Yes No	
Sound?			Yes 🔽 No	
Complies with the Duty to Cooperate		ate 📋 '	Yes 🗸 No	
Please tick	as appropriate			
Please re		is unsound, is it for explanations of	because it is not: the Tests of Soundness	
Positively Pr Justified?	repared?			
Effective?				
	with National Policy?			
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relates to soundness (NB please note that incapable of modification at examination the Local Plan legally compliant or sound	matter you have identified at 6. above where this at any non-compliance with the duty to cooperate is a). You will need to say why this modification will make d. It will be helpful if you are able to put forward your or text. Please be as precise as possible.
Mone! as the of by new trousing the area population	area is already overpowered g estates which increased then with no additional
	Please continue on a separate sheet if necessary succinctly all the information, evidence and supporting
will not normally be a subsequent opportunity to be presentation at the publication stage. After this stage, further submissions will be and issues he/she identifies for examination	fication; do you consider it necessary to participate at
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part this to be necessary:	t of the examination, please outline why you consider

indicated that they wish to participate at the oral part of the examination

Please keep a copy for future reference.

Thank you for taking the time to complete and return this response form.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally

RO0496



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

2 7 FEB 2019

(For official use only)

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Please note that you must complete Parts A and B of this form.

(we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: N. a.s	Title:
First Name: MARGARET	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 42 CALDERHURST DRIVE	Address:
Postcode: WAIO 66D-	Postcode:
	Tel No:
Mobile No:	Mobile No:
	Email:
	Date: 21st Feb -2019
considered you MUST include your details above.	e accepted and that in order for your comments to be
	ges of the St Helens Borough Local Plan 2020-2035? aublication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred met we will contact you by your postal address.	thod of communication. If no email address is provided,

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Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/secti	on)		
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		Tor explanations of Le		e lesis of Soundhe
Legally Cor	. Pilatici			
Sound?	(I) Direction	☐ Yes	∑ No	
Sound?	rith the Duty to Cooper	☐ Yes		
Sound? Complies w		☐ Yes		
Sound? Complies w Please tick 5. If you co	rith the Duty to Cooper	rate Yes	No cause it is not:	
Sound? Complies w Please tick 5. If you co	rith the Duty to Cooper as appropriate nsider the Local Plar ad the Guidance note	rate Yes	No cause it is not:	
Sound? Complies w Please tick 5. If you co Please re	rith the Duty to Cooper as appropriate nsider the Local Plar ad the Guidance note	Yes Tate Yes This unsound, is it be for explanations of the	No cause it is not:	
Sound? Complies w Please tick 5. If you co Please re Positively Properties Positively Properties Positively Properties Pro	rith the Duty to Cooper as appropriate nsider the Local Plar ad the Guidance note	Yes Tate Yes This unsound, is it be for explanations of the	No cause it is not:	

ith the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The analysis is based on assumption nor fact. I believe more reasonable options have not been fully explored is the development of brown field land closer to the town centre. This would then mean it unccessary to put in place the additional infrastructure, which would be Vital if the proposed plan was to go ahead.

Local Plan legally compliant or sound.	You will need to say why this modification will mak It will be helpful if you are able to put forward your r text. Please be as precise as possible.
	Please continue on a separate sheet if necess
No, I do not wish to participate	Yes, I wish to participate at the oral
at the oral examination	examination
u wish to participate at the oral part of to be necessary:	the examination, please outline why you consider

Please keep a copy for future reference.

1800756M

RO0497



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13th May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

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	1 4	

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: A ~ THO~ T	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 8 DALE CRESCENT ST HELEND	Address:
Postcode: WAG LYE	Postcode:
Tel No: *	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 29/4/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes [(Via Email)	No 🗀
Please note - e-mail is the Councaddress is provided, we will conta	l's preferred method of communication. If no e-mail ct you by your postal address.

RO0498

Web Reference Number	WF0314
Type of Submission	Web submission
Full Name	Mr Christopher Dunn
Organisation	
Address	
100000000000000000000000000000000000000	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05/LPA06	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents	Green Belt Review (2018)	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes	
Is sound?	No	
Complies with the duty to cooperate?	Yes	

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I strongly believe adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and therefore, no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The statement from St Helens Council of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens.

Two Green Belt sites of 49 ha and 53 ha are being reclassified as 'safeguarded' land sites and included to fulfill the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

There is no reason or sense to release green belt land when so much brownfield land is available within the borough - land that should and can be re-mediated.





The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date 3/7/2019 11:02:31 AM

RO0499

Web Reference Number	WF0315
Type of Submission	Web submission
Full Name	Mrs Susan Dunn
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05/LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes	
Is sound?	No	_
Complies with the duty to cooperate?	Yes	

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

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No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

3/7/2019 10:59:49 AM

mapiros a district	
Web Reference Number	WF0316
Type of Submission	Web submission
Full Name	Mrs Susan Dunn
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05/LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

3/7/2019 10:59:44 AM

Web Reference Number	WF0317
Type of Submission	Web submission
Full Name	Mrs Susan Dunn
Organisation	
Address	
Agent Details	

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Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05/LPA06	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents	Green Belt Review (2018)	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes	
Is sound?	No	
Complies with the duty to cooperate?	Yes	

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date 3/7/2019 10:58:22 AM

RO0500



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

O 13 MAY 2019

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

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Would you like to be kept updated of future st Plan 2020-2035? (namely submission of the Plan	
Inspector's recommendations and adoption of the	
Yes [(Via Email)	No 🗌
Please note - e-mail is the Council's preferred me address is provided, we will contact you by your	